INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

August 1, 2003

TO: Interested Parties / Applicant

RE: Crawfordsville Electric Light and Power
107-6495-00003

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-6-1(b) require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, Indiana 46204, **within thirty (30) days from the date of this notice**. The filing for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision or other order for which you seek review by permit number, the name of the applicant, location, the date of this notice, and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for consideration at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

(over)

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impractible to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency
Administrator, Christine Todd Whitman
401 M Street
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNTVOP.wpd 8/21/02

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Crawfordsville Electric Light and Power
700 Lafayette Road
Crawfordsville, Indiana 47933

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T107-6495-00003	
Issued by: Original Signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date:August 1, 2003 Expiration Date:August 1, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary electric generating station.

Responsible Official:	Utility Manager
Source Address:	700 Layfayette Road, Crawfordsville, Indiana 47933
Mailing Address:	808 Layfayette Rd., P.O. Box 428, Crawfordsville, IN 47933
General Source Phone Number:	(317)362-1900
SIC Code:	4911
County Location:	Montgomery
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules Major Source, Section 112 of the Clean Air Act 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) spreader stoker coal-fired boiler, identified as Unit 5, constructed in 1955, rated at 175 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by a multiclone mechanical separator, emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 192 foot (above grade) stack having an 84 inch exit diameter. This boiler also has a 53 mmBtu per hour natural gas burner for start-up, boiler flame control and stabilization; and opacity control.

(b) One (1) spreader stoker coal-fired boiler, identified as Unit 6, constructed in 1965, rated at 192 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by an electrostatic precipitator and a multiclone mechanical separator, emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 198 foot (above grade) stack having a 96 inch exit diameter.

(c) Coal and ash storage and handling consisting of the following systems:

(1) One (1) 1.13 acre outdoor coal storage pile with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.

(2) One (1) coal unloading system which consists of end dump semi trailer trucks with a maximum throughput of 110 tons per hour and a maximum annual throughput of 140,000 tons per year.

(3) One (1) coal reclaim, transfer and conveying system, which has internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader)Transfer to reclaim hopper, followed by conveyor transfer to bunkers, storage capacity for the external coal bunker is 100 tons. The maximum throughput is 200 tons per hour and 140,000 tons per year.

(4) One (1) ash handling load out system with inside storage and wetting and a storage capacity of 100 tons. The maximum throughput is 50 tons per hour and 21,000 tons per year. The dust during silo load out to the trucks is controlled with pug mill wetting and spray bars.

(5) One (1) ash handling load in system with enclosed silo storage and a storage capacity of 100 tons. Emissions are controlled by a baghouse. The maximum throughput is 14 tons per hour and 21,000 tons per year.

(d) One (1) 1000-kilowatt Black Start electricity generator utilizing one (1) 10 mmBtu/hr piston-driven internal combustion engine operating on #2 diesel fuel.

(e) Fugitive emissions from vehicle traffic. A combination of roads include asphalt and unpaved crushed stone road surfaces. There are light duty trucks, dump trucks and passenger cars. Wet spray is used during dry weather to control dust blowing.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment and welding equipment.

(b) Structural steel and bridge fabrication activities:
(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent
(2) Using 80 tons or less of welding consumables.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(c) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification can cover multiple forms in one (1) submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent; and

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3).

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) The Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, for emission units and any control devices specifically required to have a PMP by Section D condition in this permit. Each PMP shall include following:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The submittal of the PMPs does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967.

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit

shield provides that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IAC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit, except for permits issued pursuant to Title IV of the Clean Air Act or 326 IAC 21 (Acid Deposition Control).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3] [326 IAC 2-7-4]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by a

reasonable deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application. [326 IAC 2-7-4(a)(2)(D) and (E)]

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Source Modification [326 IAC 1-2-42] [326 IAC 2-7-10.5]

(a) The Permittee shall obtain approval as required by 326 IAC 2-7-10.5 from the OAQ prior to making any modification to the source. Pursuant to 326 IAC 1-2-42, "Modification" means one (1) or more of the following activities at an existing source:

(1) A physical change or change in the method of operation of any existing emissions unit that increases the potential to emit any regulated pollutant that could be emitted from the emissions unit, or that results in emissions of any regulated pollutant not previously emitted.

(2) Construction of one (1) or more new emissions units that have the potential to emit regulated air pollutants.

(3) Reconstruction of one (1) or more existing emission units that increases the potential to emit of any regulated air pollutant.

(b) Any application requesting a source modification shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee shall also comply with the applicable provisions of 326 IAC 2-7-11 (Administrative Permit Amendments) or 326 IAC 2-7-12 (Permit Modification) prior to operating the approved modification.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12] [40 CFR 72]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Pursuant to 326 IAC 2-7-11(b) and 326 IAC 2-7-12(a), administrative Part 70 permit amendments and permit modifications for purposes of the acid rain portion of a Part 70 permit shall be governed by regulations promulgated under Title IV of the Clean Air Act. [40 CFR 72]

(c) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the

Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b)(1), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Inspection and Entry [326 IAC 2-7-6] [IAC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee’s right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2] [40 CFR Subpart P]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of

326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

Testing Requirements [326 IAC 2-7-6(1)]

C.8 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.9 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety

(90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems (COMS) and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

(b) In the event that a breakdown of a continuous opacity monitoring system occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(c) Whenever a continuous opacity monitor (COM) is malfunctioning or will be down for calibration, maintenance, or repairs for a period of one (1) hour or more, compliance with the applicable opacity limits shall be demonstrated by the following:

(1) Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the boiler at the time of the reading.

(A) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(B) If abnormal emissions are noted during two consecutive emission notations, the Permittee shall begin Method 9 opacity observations with four hours of the second abnormal notation.

(C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.

(2) If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the boiler stack.

(A) Visible emission readings shall be performed in accordance with 40

CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods) beginning not more than twenty-four (24) hours after the start of the malfunction or down time.

(B) Method 9 opacity readings shall be repeated for a minimum five (5) consecutive six (6) minute averaging periods) at least once every four (4) hours during daylight operations, until such time that a COM is in operation.

(C) Method 9 readings may be discontinued once a COM is online.

(3) If abnormal emissions are observed at any boiler exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(4) All of the opacity readings during this period shall be reported with the Quarterly Opacity Exceedances Reports.

(d) Nothing in this permit shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitoring system pursuant to 326 IAC 3-5.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60 Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

(a) If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement.

(b) The Permittee shall verify that a Risk Management Plan or a revised plan was prepared as required by 40 CFR 68 and submitted to IDEM, OAQ.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Response Plan - Preparation, Implementation, Records and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(d) Pursuant to 40 CFR 82, Subpart E (The Labeling of Products Using Ozone-Depleting Substances), all containers in which a Class I or Class II substance is stored or transported and all products containing a Class I substance shall be labeled as required under 40 CFR Part 82.

Part 2 MACT Application Submittal Requirement

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2

MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 64, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United State Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(1) One (1) spreader stoker coal-fired boiler, identified as Unit 5, constructed in 1955, rated at 175 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by a multiclone mechanical separator, emissions are measured by a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 192 foot (above grade) stack having an 84 inch exit diameter. This boiler also has a 53 mmBtu per hour natural gas burner for start-up, boiler flame control and stabilization; and opacity control.

(2) One (1) spreader stoker coal-fired boiler, identified as Unit 6, constructed in 1965, rated at 192 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by an electrostatic precipitator and a multiclone mechanical separator, emissions are measured by a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 198 foot (above grade) stack having a 96 inch exit diameter.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3(d)]

Pursuant to 326 IAC 6-2-3(d) (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter from any facility used for indirect heating purposes which were existing on or before June 8, 1972, shall in no case exceed 0.8 lb/mmBtu heat input.

D.1.2 Opacity Exemption [326 IAC 5-1-3]

(a) Pursuant to 326 IAC 5-1-3 (e) (Temporary Alternative Opacity Limitations), the following applies:

Unit 5

(1) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods), with opacity not to exceed eighty (80) percent.

(2) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.

Unit 6

(1) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty six (36) minutes (six (6)-minute averaging periods), with opacity not to exceed eighty (80) percent.

(2) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.

(3) Operation of the electrostatic precipitator is not required during these times unless necessary to comply with these limits.

(b) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

D.1.3 Sulfur Dioxide Emissions Limitations [326 IAC 7-1.1]

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), the SO_2 emissions from either unit 5 or unit 6 shall not exceed 6.0 pounds per million Btu (lbs/mmBtu).

D.1.4 Operation Standards [326 IAC 2-1.1-5(a)(4)] 40 CFR 261] [329 IAC 13]

(a) All coal burned, including coal treated with any additive, shall meet the ASTM definition of coal.

(b) The burning of hazardous waste, as defined by 40 CFR 261, is prohibited in these facilities. Any boiler tube chemical cleaning waste liquids, binding agent, or used oil combusted shall meet the toxicity characteristic requirements for non-hazardous waste.

(c) Any boiler tube chemical cleaning waste liquids fired in the boiler shall only contain the cleaning solution and two full volume boiler rinses.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

(a) A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their emission control devices.

(b) The PMP for an electrostatic precipitator shall include the following inspections, performed according to the indicated schedules:

(1) Plate and electrode alignment, every major maintenance outage, but no less than every two years;

(2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed in the last six months. At a minimum, the following inspections shall be performed:

(A) Internal inspection of shell corrosion (i.e., doors, hatches, insulator housings, roof area).
(B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and plates).
(C) Gas distribution (i.e. buildup of dust on distribution plates and turning vanes).
(D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
(E) Major misalignment of plates (i.e., visual check of plate alignment).
(F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.)
(G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.)

(H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration)
(I) TR set controllers (i.e., low voltage trip point, over current trip point, spark rate, etc.)

(3) Air and water infiltration, once/month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.

(c) An inspection of the internal components of the multiclone shall be conducted at least every two (2) years, or 6000 hours of operation, whichever occurs first, in accordance with the Section B - Preventive Maintenance Plan. Items to be checked include air infiltration, plugging of inlet spinner vanes, outlet tube erosion, deposits on the inside surfaces of the cyclone tubes, and plugging of the bottom of the cyclone tubes.

(d) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports for any improper or abnormal conditions found during the multiclone inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within the two (2) calendar years following the most recent stack test, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test using methods as approved by the commissioner. This test shall be repeated at least once every two (2) calendar years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

D.1.7 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the electrostatic precipitator for unit 6 shall be operated at all times that the boiler vented to the ESP is in operation.

D.1.8 Operation of Multiclone [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule or in this permit, the multiclone for unit 5 shall be operated at all times that the boiler is in operation.

D.1.9 Sulfur Dioxide Emissions and Sulfur Content [326 IAC 7-2] [326 IAC 7-1.1-2]

(a) Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the sulfur dioxide emissions from unit 5 or unit 6 do not exceed the equivalent of 6.0 pounds per mmBtu demonstrated using a calendar month average. Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:

(1) Pursuant to 326 IAC 3-7-2(b)(1), the Permittee shall comply with the requirements specified in 326 IAC 3-7-2(a); or

(2) Pursuant to 326 IAC 3-7-2(b)(2) and 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specified in 326 IAC 3-7-2 or

of continuous emissions monitoring; or

(3) Pursuant to 326 IAC 3-7-2(b)(3), the Permittee shall meet the following minimum requirements:

(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered or as-burned sampling station may be used to represent the coal to be combusted by multiple facilities using the same stockpile feed system.

(B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period.

(C) Minimum sample size shall be five hundred (500) grams.

(D) Samples shall be composited and analyzed at the end of each calendar month.

For options (a)(1) and (a)(3) of this condition, the coal samples shall be prepared as specified in 326 IAC 3-7-2(c), the heat content of the coal samples shall be determined as specified in 326 IAC 3-7-2(d), and the sulfur content of the coal samples shall be determined pursuant to 3-7-2(e).

(b) Compliance with the emission limitations contained in 326 IAC 7 may be determined by conducting a stack test for sulfur dioxide emissions from the boiler in accordance with 326 IAC 3-6, utilizing the procedures in 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8. [326 IAC 7-2-1(d)]

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method. [326 IAC 7-2-1(f)]

(c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]

D.1.10 Cleaning Waste Analysis [326 IAC 2-1.1-5(a)(4)] [40 CFR 261]

The Permittee shall use appropriate test methods as listed in 40 CFR Part 261 to analyze all boiler chemical cleaning wastes that will be burned, to determine the concentration of the compounds listed in the Operation Standards condition in this D section.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.11 Transformer-Rectifier (T-R) Sets [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) The ability of the ESP to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer rectifier (T-R) sets.

(b) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever more

than one of T-R sets is out of service. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

D.1.12 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) In the event of opacity for Unit 5 exceeding thirty percent (30%) average opacity for three (3) consecutive six (6) minute averaging periods or the opacity for Unit 6 exceeding twenty percent (20%) average opacity for three (3) consecutive six (6) minute averaging periods, appropriate response steps shall be taken such that the causes of the excursion are identified and corrected and opacity levels are brought back below thirty percent (30%) for Unit 5 and twenty percent (20%) for Unit 6. Examples of expected corrective actions include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.

(b) Opacity readings in excess of thirty percent (30%) for Unit 5 or twenty percent (20%) for Unit 6 but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.13 Monitoring: Multiclone [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(c) The ability of the multiclone to control particulate emissions from unit 5 shall be monitored at least once per shift, when the unit is in operation, by measuring and recording the total static pressure drop across the multiclone. Pressure drop monitoring equipment shall be installed in accordance with Section C - Compliance Monitoring.

(d) Normal operating range will be determined within the first two hundred (200) hours of boiler operation after installation of the pressure drop monitoring equipment. The IDEM shall be notified within the first two hundred (200) hours of this determination.

(e) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the static pressure drop is outside of the normal operating range for the corresponding boiler steam load. A pressure drop reading that is outside normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.14 Record Keeping Requirements

(a) To document compliance with Conditions D.1.3 and D.1.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be sufficient to demonstrate compliance using a thirty (30) day rolling weighted average and shall be complete and sufficient to establish compliance with the SO_2 limit established in Condition D.1.3.

(1) Calendar dates covered in the compliance determination period;

(2) Actual coal usage since last compliance determination period;

(3) Sulfur content and heat content; and

(4) Sulfur dioxide emission rates.

(b) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.

(c) To document compliance with Section C - Opacity and Conditions D.1.1, D.1.2, D.1.4, D.1.5, D.1.6, D.1.10, D.1.11, D.1.12, D.1.13, D.1.14 and D.1.15, the Permittee shall maintain records in accordance with (1) through (5) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1 and D.1.2.

(1) Data and results from the most recent stack test;

(2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5;

(3) All parametric monitoring readings;

(4) Records of the results of the ESP and multiclone inspections; and

(5) All preventive maintenance measures taken

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.15 Reporting Requirements

A quarterly summary report of opacity exceedances and a quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this description box is descriptive information and does not constitute enforceable conditions.)

Coal and ash storage and handling consisting of the following systems:

(a) One (1) 1.13 acre outdoor coal storage area with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.

(b) One (1) coal unloading system which consists of end dump semi trailer trucks with a maximum throughput of 110 tons per hour and a maximum annual throughput of 140,000 tons per year.

(c) One (1) coal reclaim, transfer and conveying system, which has an internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader)Transfer to reclaim hopper, followed by conveyor transfer to bunkers, storage capacity for the external coal bunker is 100 tons. The maximum throughput is 200 tons per hour and 140,000 tons per year.

(d) One (1) ash handling load out system with inside storage and wetting and a storage capacity of 100 tons. The maximum throughput is 50 tons per hour and 21,000 tons per year. The dust during silo load out to the trucks is controlled with pug mill wetting and spray bars.

(e) One (1) ash handling load in system with enclosed silo storage and a storage capacity of 100 tons. Emissions are controlled by a baghouse. The maximum throughput is 14 tons per hour and 21,000 tons per year. The dust during pneumatic conveying is controlled with a primary cyclone ash separator/fabric filter baghouse.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the coal unloading and the reclaim, transfer and conveying system shall not exceed 58.5 pounds per hour when operating at a process weight rate of 200 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.2 Particulate Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable particulate emission rate from the ash load out and load in system shall not exceed 44.6 pounds per hour when operating at a process weight rate of 50 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0P^{0.11} - 40$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.2.4 Particulate Matter (PM) Control [326 IAC 2-7-6(6)]

(a) The baghouse for PM control shall be in operation at all times when the ash load in operations are in operation and exhausting to the outside atmosphere.

(b) The pug mill wetting and spray bars shall be in operation at all times when the ash handling load out system is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) Visible emission notations of the baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the ash handling system, coal unloading system, coal storage area and coal transfer system shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) If visible emissions are observed crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

(g) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(h) If any visible emissions of dust are observed from the coal unloading station doorways, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of visible emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.2.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ash load-in system at least once per shift when the ash load in is in operation when venting to the atmosphere. When for any one reading during the collection cycle of the ash load-in system the pressure differential across the baghouse exhibits a reading outside of the normal range of 1.0 to 29 inches of water, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.2.8 Baghouse Inspections

(a) An inspection shall be performed within the last month of each calendar quarter of all bags controlling particulate emissions from the ash load in processes. All defective bags shall be replaced.

(b) If an abnormal or improper condition is found during an inspection, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of the once per shift visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain the following:

(1) Records of the total static pressure drop readings across the baghouse; and

(2) Records of the results of the baghouse inspections.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities: (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(1) Equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
(2) Structural steel and bridge fabrication activities:
  (a) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
  (b) Using 80 tons or less of welding consumables.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Emissions [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable particulate emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities shall not exceed the allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10P^{0.67}$

where E = rate of emission in pounds per hour;
And P = process weight rate in tons per hour

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

(1) A 1000-kilowatt Black Start electricity generator utilizing one (1) 10 mmBtu/hr piston-driven internal combustion engine operating on #2 diesel fuel.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Prevention of Significant Deterioration [326 IAC 2-2] [40 CFR 52.21]

Pursuant to Construction Permit 107-2608, ID 107-00003 issued on November 5, 1992 the use of #2 diesel fuel in the turbine generator shall not exceed 96,000 gallons per twelve (12) month period rolled on a monthly basis. This limit is required to limit the potential to emit of NOx to less than 40 tons of NOx per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.4.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.3 Record Keeping Requirements

(a) To document compliance with D.4.1, the Permittee shall maintain records of monthly usage of #2 diesel fuel combusted in the generator.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.4 Reporting Requirements

A summary of the information to document compliance with Condition D.4.1, shall be submitted to the address listed in Section C - General Reporting Requirements, using the reporting form currently being used, or the reporting forms located at the end of this permit or their equivalent , within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

PART 70 OPERATING PERMIT
CERTIFICATION

Source Name: Crawfordsville Electric Light and Power
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933
Mailing Address: 808 Lafayette Rd., P.O. Box 428, Crawfordsville, IN 47933
Part 70 Permit No.: T107-6495-00003

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Telephone:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: Crawfordsville Electric Light and Power
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933
Mailing Address: 808 Lafayette Rd., P.O. Box 428, Crawfordsville, IN 47933
Part 70 Permit No.:T107-6495-00003

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Telephone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Crawfordsville Electric Light and Power
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933
Mailing Address: 808 Lafayette Rd., P.O. Box 428, Crawfordsville, IN 47933
Part 70 Permit No.: T107-6495-00003
Facility: #2 diesel fuel-fired generator
Parameter: #2 diesel fuel usage
Limit: 96,000 gallons per 12 month period rolled on a monthly basis

YEAR: _____

Month	#2 Diesel Fuel (gallons)	#2 Diesel Fuel (gallons)	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Telephone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Crawfordsville Electric Light and Power
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933
Mailing Address: 808 Lafayette Road, P.O. Box 428, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-6495-00003

Months: _____ **to** _____ **Year:** _____

Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".
9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.
9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ____________________

Title/Position: ____________________

Date: ____________________

Telephone: ____________________

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Crawfordsville Electric Light and Power
Source Address: 700 Lafayette Road, Crawfordsville, Indiana 47933
Mailing Address: 808 Lafayette Road, P.O. Box 428, Crawfordsville, Indiana 47933
Part 70 Permit No.: T107-6495-00003
Facility: Unit #5 and Unit #4
Parameter: SO_2 Emission Rate
Limit: SO_2 emissions from either Unit #5 or Unit #6 shall not exceed 6.0 pounds per million Btu (lbs/mmBtu)

YEAR: _____

Month	Column 1	Column 2	Column 3	Column 4	Column 5
	Coal Consumption	Sulfur Content	Coal Heat Content	Ash Content	SO_2 Emission Rate
Month 1					
Month 2					
Month 3					

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Telephone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	Crawfordsville Electric Power and Light
Source Location:	700 Lafayette Road, Crawfordsville, Indiana 47933
County:	Montgomery
SIC Code:	4911
Operation Permit No.:	T107-6495-00003
Permit Reviewer:	Laura M. Groom

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Crawfordsville Electric Power and Light relating to the operation of an electric generating station.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) spreader stoker coal-fired boiler, identified as Unit 5, constructed in 1955, rated at 175 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by a multiclone mechanical separator, emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 192 foot (above grade) stack having an 84 inch exit diameter. This boiler also has a 53 mmBtu per hour natural gas burner for start-up, boiler flame control and stabilization; and opacity control.

(b) One (1) spreader stoker coal-fired boiler, identified as Unit 6, constructed in 1965, rated at 192 million Btu per hour heat input, used to generate electricity. Particulate emissions are controlled by an electrostatic precipitator and a multiclone mechanical separator, emissions are measured with a continuous opacity monitor. Controlled emissions are exhausted to the atmosphere through a 198 foot (above grade) stack having a 96 inch exit diameter.

(c) Coal and ash storage and handling consisting of the following systems:

(1) One (1) 1.13 acre outdoor coal storage pile with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.
(2) One (1) coal unloading system which consists of end dump semi trailer trucks and has a maximum annual throughput of 140,000 tons per year.
(3) One (1) coal reclaim, transfer and conveying system, which has an internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader Transfer to reclaim hopper, followed by conveyor transfer to bunkers, storage capacity for the external coal bunker is 100 tons. The maximum annual

throughput is 140,000 tons per year.

(4) One (1) ash handling load out system with inside storage and wetting and a storage capacity of 100 tons. The maximum annual throughput is 21,000 tons per year. The dust during silo load out on the trucks is controlled with pug mill wetting and spray bars.

(5) One (1) ash handling load in system with enclosed silo storage and a storage capacity of 100 tons. The maximum annual throughput is 21,000 tons per year. The dust during pneumatic conveying is controlled with a primary cyclone ash separator/fabric filter baghouse.

(d) A 1000-kilowatt Black Start electricity generator utilizing one (1) 10 mmBtu/hr piston-driven internal combustion engine operating on #2 diesel fuel.

(e) Fugitive emissions from vehicle traffic. A combination of roads include asphalt and unpaved crushed stone road surfaces. There are light duty trucks, dump trucks and passenger cars. Wet spray is used during dry weather to control dust blowing.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source.

New Emission Units and Pollution Control Equipment Receiving Advanced Source Modification Approval

There are no new facilities to be reviewed.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Space heaters, process heaters, or boilers using the following fuels:

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(2) Propane or liquified petroleum gas, or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour.

(3) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and not burning wood refuse, treated wood or chemically contaminated wood.

(b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu/hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.

(c) Combustion source flame safety purging on startup.

(d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(e) The following VOC and HAP storage containers:

(1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(2) Vessels storing lubricating oils, hydraulic oils, machining oils and machining

fluids.

(f) Application of oils, greases, lubricants or other nonvolatile materials applied as temporary protective coatings.

(g) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(h) Cleaners and solvents characterized as follows:

(1) having vapor pressure equal to or less than 2kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100 degrees F) or;
(2) having vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20 degrees C (68 degrees F);

The use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.

(i) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(j) Any of the following structural steel and bridge fabrication activities:

(1) Cutting 200,000 linear feet or less of one inch (1") plate or equivalent.
(2) Using 80 tons or less of welding consumables.

(k) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(l) Forced and induced draft cooling tower system not regulated under a NESHAP.

(m) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(n) Heat exchanger cleaning and repair.

(o) Process vessels degassing and cleaning to prepare for internal repairs.

(p) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.

(q) Paved and unpaved roads and parking lots with public access.

(r) Coal bunker and coal scale exhausts and associated dust collector vents.

(s) Asbestos abatement projects regulated by 326 IAC 14-10.

(t) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures or vehicles at the source where air emissions from those activities would not be associated with any production process.

(u) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks and fluid handling equipment.

(v) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.

(w) On-site fire and emergency response training approved by the department.

(x) Purge double block and bleed valves.

(y) Filter and coalescer media changeout.

(z) Vents from ash transport systems not operated at positive pressure.

(aa) Activities or categories of activities with individual HAP emissions not previously mentioned:

Any unit emitting greater than 1 pound per day but less than 5 pounds per day or 1 ton per year of a single HAP:

(1) Induced draft cooling towers

(bb) Activities with emissions equal to or less than thresholds:

Lead (Pb)=0.6 ton/year or 3.29 lbs/day
Carbon Monoxide (CO)=25 lbs/day
Sulfur Dioxide(SO_2)= 5 lbs/hour or 25 lbs/day
Particulate Matter(PM)=5 lbs/hour or 25 lbs/day
Nitrogen Oxides (NOx)=5 lbs/hour or 25 lbs/day
Volatile Organic Compounds (VOC)=3 lbs/hour or 15 lbs/day

(1) Non-PCB Containing Electric Power Transformers
(2) Pebble Lime Storage Silo Loading Vent
(3) Steam Electric Turbine/Generator Lubricating Oil Tanks and Coolers
(4) Non-contact Cooling Towers

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:.

(1) CP107-2608, issued on November 5, 1992; and

(2) OP 54-12-92-0169, issued on March 17, 1990; and

(3) OP 54-12-92-0170, issued on March 17, 1990; and

(4) OP 54-12-92-0171, issued on March 17, 1990; and

(5) CP107-2445, issued on February 24, 1994; and

(6) CP107-2340, issued on February 14, 1992; and

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:
Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on September 3, 1996.

A notice of completeness letter was mailed to the source on October 29, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (3 pages)

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations for the coal and ash handling operations are provided as an attachment to this document. See attachment B, "Process Source Air Emissions Inventory".

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	Greater than 100
PM-10	Greater than 100
SO_2	Greater than 100
VOC	Less than 100
CO	Greater than 100
NO_x	Greater than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Combined	95
TOTAL	95

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16) of particulate matter less than ten (10) microns (PM_{10}), sulfur dioxide (SO_2), nitrogen oxides (NOx), and carbon monoxide (CO) are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the Source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 the fugitive particulate matter (PM) emissions are counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	44
PM-10	11
SO_2	417
VOC	0
CO	31
NO_x	85
HAP (specify)	26

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Unit 5	374	142	2,165	2	166	366	45
Unit 6	48	75	2,376	3	182	402	50
Coal Handling Operations	33	16	- - -	- - -	- - -	- - -	- - -
Ash Handling Operation	63	32	- - -	- - -	- - -	- - -	- - -
Diesel-fired Generator	4	10	11	4	37	140	- - -
Total Emissions	522	275	4,552	9	385	908	95

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source. However the boilers did not undergo PSD review based on the dates of construction, which were before August 1977, when PSD limits were established.

County Attainment Status

The source is located in Montgomery County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
VOC	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Montgomery County has been designated as attainment or unclassifiable for ozone.

(b) Montgomery county has been classified as attainment or unclassifiable for Particulate Matter less than ten (10) microns (PM_{10}), sulfur dioxide (SO_2), ozone and carbon monoxide (CO).

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The two (2) spreader stoker coal-fired boilers are not subject to the requirements of the New Source Performance Standards, 326 IAC 12, (40 CFR 60, Subparts D, Da, Db, or Dc), due to the dates of construction.

(c) This source is not an affected source subject to the Title IV (Acid Rain Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3), because capacity of the generators is less than 25 MWe, and is therefore exempt under 40 CFR 72.6(b)(2).

(d) The Standards of Performance for Nonmettalic Mineral Plants, 40 CFR Part 60, Subpart OOO do not apply because the Source does not use nometallic minerals.

(e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (40 CFR 63) applicable to this source. 40 CFR 63, Subpart T (Halogenated Solvent Degreasing) does not apply because the solvents the source uses are not listed in 40 CFR 63.460, applicability and designation of source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source. However the boilers did not undergo PSD review based on the dates of construction, which were before August 1977, when PSD limits were established.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of particulate matter less than ten (10) microns (PM10), sulfur dioxide (SO_2), nitrogen oxides (NOx) and carbon monoxide (CO). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emission Limitations), the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

State Rule Applicability - Boilers (Unit 5 and Unit 6)

326 IAC 6-2-3(d) (Particulate Matter Limitations)

Pursuant to 326 IAC 6-2-3(d) (Particulate Matter Emissions for Sources of Indirect Heating), the PM emissions from each boiler shall not exceed 0.8 lb/mmBtu heat input. This limit is applicable because 326 IAC 6-2-3(d) is more stringent than the limit using the formula given in 326 IAC 6-2-3(a), which was calculated as 1.74 lb/mmBtu.

$$Pt = \frac{(C)\,(a)\,(h)}{76.5\ (Q^{0.75})\ (N^{0.25})}$$

Where C = 50 F/m^3
Q = total source capacity (mmBtu/hr)
N = number of stacks
a = 0.67
h = average stack height (feet)
Pt = pounds of particulate matter emitted per million Btu heat input (lb/mmBtu)

Unit 5

$$Pt = \frac{(50)(0.67)(192)}{(76.5)(175^{0.75})(1^{0.25})}$$

Pt = 1.74 lb/mmBtu

Unit 6

$$Pt = \frac{(50\ F/m^3)(0.67)(195)}{(76.5)(367^{0.75})(2^{0.25})}$$

Pt = 0.86 lb/mmBtu

The boilers are in compliance with this limit, based on the capacities of the boilers. Unit #6 shall operate the ESP and unit #5 shall operate the multiclone at all times the boilers are in operation unless otherwise provided in the permit, in order to comply with this limit. Please refer to pages 17 and 18 of this TSD for detailed calculations.

326 IAC 5-1-3 (Opacity Exemption)

Pursuant to 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations) the following applies:

Unit 5

(a) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty (30) minutes (five (5) six (6)-minute averaging periods), with

opacity not to exceed eighty (80) percent.

(b) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.

(c) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

Unit 6

(a) When building a new fire in a boiler, opacity may exceed the 40% opacity limitation for a period not to exceed thirty six (36) minutes (six (6)-minute averaging periods), with opacity not to exceed eighty (80) percent.

(b) When shutting down a boiler, opacity may not exceed sixty (60) percent for any six (6) minute averaging period. Opacity in excess of the applicable limit established in 326 IAC 5-1-2 shall not continue for more than two (2) six (6)-minute averaging periods in any twenty-four hour period.

(c) When removing ashes from the fuel bed or furnace in a boiler or blowing tubes, opacity may exceed the applicable limit established in 326 IAC 5-1-2 and stated in Section C - Opacity. However, opacity levels shall not exceed sixty percent (60%) for any six (6)-minute averaging period and opacity in excess of the applicable limit shall not continue for more than one (1) six (6)-minute averaging periods in any sixty (60) minute period. The averaging periods shall not be permitted for more than three (3) six (6)-minute averaging periods in a twelve (12) hour period.

Temporary Alternative Opacity Limitations

Energizing an Electrostatic Precipitator (ESP) when the flue gas temperature is below the sulfuric acid dew point can result in damage to the precipitator. Condensation of sulfuric acid in the ESP may cause corrosion. It may also condense on the dust in the unit causing hard deposits which reduce the PM collection efficiency of the ESP. During the ignition of a coal-fired boiler, there is also a risk of a fire or an explosion if the ESP is energized too early. Normal sparking can ignite any combustible gases in the unit. It is not reasonable to require the use of an ESP when the ESP cannot be safely energized. Therefore, less restrictive opacity requirements are commonly applied during startup and shutdown for boilers that rely on ESPs for opacity control.

Most of the old State operating permits for utilities with coal-fired boilers included alternative opacity limits for periods of startup and shutdown. These pre-existing alternative limits, also known as opacity exemptions, were not federally enforceable. The Title V permits for these sources include federally enforceable Temporary Alternative Opacity Limits (TAOLs). The new TAOLs are established using the Quarterly Excess Opacity Emissions Reports from each source. The State is bound by the provisions in 326 IAC 5-1-3(e) to establish limits which, among other things, “limit the duration and extent of excess emissions to the greatest degree practicable,” and “minimize the duration and extent of excess emissions.”

The EPA used its September 20, 1999, memorandum entitled “State Implementation Plans: Policy Regarding Excess Emissions During Malfunctions, Start-up, and Shutdown” to evaluate

the exemptions provisions in 326 IAC 5-1-3(e). To be approved, the provisions must meet the following requirements:

1. The revision must be limited to specific, narrowly-defined source categories using specific control strategies;
2. Use of the control strategy for this source category must be technically infeasible during start-up or shutdown periods;
3. The frequency and duration of operation in startup or shutdown mode must be minimized;
4. As part of its justification of the SIP revision, the state should analyze the potential worst-case emissions that could occur during start-up and shutdown;
5. All possible steps must be taken to minimize the impact of emissions during start-up and shutdown on ambient air quality;
6. At all times, the facility must be operated in a manner consistent with good practice for minimizing emissions;
7. The owner or operator's actions during start-up and shutdown periods must be documented by properly signed, concurrent operating logs, or other relevant evidence.

EPA has determined that language in the Indiana rule does satisfy the September 20, 1999 policy requirement. 326 IAC 5-1-3(e) states that each facility must submit "documentation including, but not limited to, historical opacity information during periods of start-up and shutdown and other pertinent information and proposed permit conditions that limit the duration and extent of excess emissions to the greatest practicable extent. The commissioner shall incorporate permit conditions that are necessary for safe and proper operation of equipment and minimize the duration and extent of excess emissions. Such conditions shall require the source to keep records of times of start-ups, shutdowns, and ash removals and may be more stringent than the operating permit conditions in effect as of the effective date of this rule." The rule was effective on November 8, 1998. In an October 10, 2001 letter to EPA, Indiana stated, "we anticipate tightening the allowable time periods and requirements for these limitations as we develop the Title V permits for these sources, based on historical information about emissions during these periods." This will further minimize the frequency and duration of excess emissions.

326 IAC 7-1.1-2 (Sulfur Dioxide Emissions Limitations)

Pursuant to 326 IAC 7-1.1-2 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from Unit 5 and Unit 6 shall each not exceed 6.0 pounds per million Btu (lbs/mmBtu) when combusting coal.

The units are in compliance based on the capacities of the boilers. The potential sulfur dioxide emissions for Unit 5 and Unit 6 are 2.82 lbs/mmBtu each. Please see page 19 of this TSD for detailed calculations.

(Chemical Cleaning Waste Analysis)

The IDEM is aware that the Source sends the chemicals off-site after cleaning. However, this condition is included in the permit so that should the source decide to burn chemical waste, it is included in the permit.

State Rule Applicability - Coal and Ash handling operations

326 IAC 6-3-2 (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the coal handling processes shall not exceed 26.3 pounds per hour when operating at a process weight rate of 16.0 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

326 IAC 6-3-2 (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the ash handling processes shall not exceed 7.4 pounds per hour when operating at a process weight rate of 2.4 tons per hour.

The pounds per hour limitation was calculated using the following equation:
Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The baghouse and pug mill wetting and spray bars shall be in operation at all times the ash handling processes are in operation, in order to comply with this limit.

326 IAC 6-4 (Fugitive Dust Emissions: Emission Limitations)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

State Rule Applicability - Diesel-fired Generator

326 IAC 6-2-4 (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emissions Limitations), particulate emissions from the diesel generator shall not exceed 0.23 pound per million Btu heat input (lb/mmBtu). This limitation was calculated using the following equation:

$Pt = \frac{1.09}{Q^{0.26}}$

Pt = pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. (377 mmBtu/hr)

The generator is in compliance with this limit based on the fuel type being used. Please see page 20 of this TSD for detailed calculations.

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to Construction Permit 107-2608, ID 107-00003 issued on November 5, 1992 the use of #2 diesel fuel in the turbine generator shall not exceed 96,000 gallons per twelve (12) month period rolled on a monthly basis. This limit is required to limit the potential to emit of NOx to less than 40 tons of NOx per 12 consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. Please see page 20 of this TSD that shows detailed calculations which demonstrate this fuel limit does keep NOx emissions below 40 tons.

State Rule Applicability - Insignificant Activities: Degreasing Operations, Brazing Equipment, Cutting Torches, Soldering Equipment, Welding Equipment, Structural Steel and Bridge Fabrication Activities.

326 IAC 6-3-2 (Particulate Matter Emissions Limitations)

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the brazing equipment, cutting torches, soldering equipment, welding equipment and structural steel and bridge fabrication activities shall not exceed the allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10P^{0.67}$ where E = rate of emission in pounds per hour;
And P = process weight rate in tons per hour

326 IAC 8-3-2 and 326 IAC 8-3-5(a) (Cold Cleaner Degreasing Operation and Control)

The degreasing operation was installed prior to 1953, which is prior to the applicability date of 1980 for 326 IAC 8-3-2 and before 1990, which is the applicability date for 326 IAC 8-3-5.

Testing Requirements

Unit 5 and Unit 6 are required to stack test every two (2) years for PM.

The next compliance test for particulate shall be conducted with one (1) of the three (3) TR sets out of service to demonstrate that Unit 6 is able to operate in compliance with the PM and Opacity limit with only two (2) T-R sets in service.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The boilers (Unit 5 and Unit 6) have applicable compliance monitoring conditions as specified below:

   Opacity Readings

   (a) Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports whenever the opacity of Unit 5 exceeds 30 percent or the opacity of Unit 6 exceeds 20 percent for three (3) consecutive six (6) minute averaging periods. In the event of opacity for Unit 5 exceeding 30 percent or the opacity for Unit 6 exceeding 20 percent, response steps will be taken such that the causes of the excursion are identified and corrected and opacity levels are brought back below 30 percent for Unit 5 and 20 percent for Unit 6. Examples of expected corrective actions include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.

   (b) Opacity readings in excess of 30 percent for Unit 5 or 20 percent for Unit 6 but

not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Preventive Inspections: Electrostatic Precipitators

(a) The following inspections shall be performed according to the indicated schedules, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:

(1) Plate and electrode alignment, performed annually, not to exceed eighteen (18) months.

(2) ESP TR set components, performed annually, not to exceed eighteen (18) months. At a minimum, the following inspections shall be performed:

(A) Internal inspection of shell corrosion (i.e., doors, hatches, insulator housings, roof area).
(B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and plates.)
(C) Gas distribution (i.e., buildup of dust on distribution plates and turning vanes.)
(D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
(E) Major misalignment of plates (i.e., visual check of plate alignment).
(F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.)
(G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.)
(H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration)
(I) TR set controllers (i.e., low voltage trip point, over current trip point, park rate, etc.)
(J) Vibrator air pressure settings

(3) Air and water infiltration, once/month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.

(b) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports for any improper or abnormal conditions found during an inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Transformer-Rectifier (T-R) Sets

(a) The ability of the ESP to control particulate emissions shall be monitored once per shift, when the unit is in operation, by measuring and recording the number of T-R sets in service and the primary and secondary voltages and the currents of the transformer rectifier (T-R) sets.

(b) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever more than one of T-R sets is out of service. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

The next compliance test for particulate shall be conducted with one (1) of the three (3) TR sets out of service to demonstrate that unit 6 is able to operate in compliance with the PM and Opacity limit with only two (2) T-R sets in service.

Preventive Inspections: Multiclone (Unit 5)

(a) An inspection of the internal components of the multiclone shall be conducted at least every two (2) years, or 6000 hours of operation, whichever occurs first, in accordance with the Section B - Preventive Maintenance Plan. Items to be checked include air infiltration, plugging of inlet spinner vanes, outlet tube erosion, deposits on the inside surfaces of the cyclone tubes, plugging of the bottom of the cyclone tubes.

(b) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports for any improper or abnormal conditions found during the multiclone inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Monitoring: Multiclone (Unit 5)

(a) The ability of the multiclone to control particulate emissions from unit 5 shall be monitored at least once per shift, when the unit is in operation, by measuring and recording the static pressure drop across the multiclone. Pressure drop monitoring equipment shall be installed in accordance with Section C - Compliance Monitoring.

(b) Normal operating range will be determined within the first two hundred (200) hours of boiler operation after installation of the pressure drop monitoring equipment. The IDEM shall be notified within the first two hundred (200) hours of this determination.

(c) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the static pressure drop falls out of normal operating range for the corresponding boiler steam load. A pressure drop reading that is outside normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

2. The ash silo load in process has applicable compliance monitoring conditions as specified below:

Visible Emissions Notations

(a) Visible emission notations of the baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the

atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the ash handling system, coal unloading system, coal storage area and coal transfer system shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.

(d) In the case of batch or continuous operations, readings shall be taken during the part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) If visible emissions are observed crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

(g) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of an abnormal emission is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Baghouse Parametric Monitoring

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ash silo load in process, at least once per shift when the ash silo load-in process is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 18.0 and 24.0 inches of water or a range established within five hundred (500) hours of operation, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(b) The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ and shall be calibrated at least once every six (6) months.

Broken or Failed Bag Detection

In the event that bag failure has been observed:

For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Baghouse Inspections

(a) An inspection shall be performed each calender quarter of all bags controlling the ash load in process. All defective bags shall be replaced.

(b) If an abnormal or improper condition is found during an inspection, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Conclusion

The operation of this electric generating station shall be subject to the conditions of the attached proposed Part 70 Permit No. T107-6495-00003.

Boiler #5 Particulate Emission Rate
Constructed in 1955, 175 mmBtu/hr

Particulate Emission Rate before controls

2,200 ton/year x 1 year/8,760 hours x 2,000 lbs/ton x 1 hour/175 mmBtu = 2.87 lb/mmBtu

Particulate Emissions Rate after controls (Cyclones)

2,200 ton/year x (1 - 83.18) = 374 tons/year

374 tons/year x year/8,760 hour x 2,000 lbs/ton = 85.39 lbs/hour

85.39 lbs/hour x hour/175 mmBtu = 0.49 lb/mmBtu

Calculations for Particulate Matter Limitations 326 IAC 6-2-3

$$Pt = \frac{(C)\,(a)\,(h)}{76.5\ (Q^{0.75})\ (N^{0.25})}$$

Where C = 50 F/m^3
Q = total source capacity (mmBtu/hr)
N = number of stacks
a = 0.67
h = average stack height (feet)
Pt = pounds of particulate matter emitted per million Btu heat input (lb/mmBtu)

$$Pt = \frac{(50)(0.67)(192)}{(76.5)(175^{0.75})(1^{0.25})}$$

Pt = 1.74 lb/mmBtu

Boiler #6 Particulate Emission Rate
Constructed in 1965, 192 mmBtu/hr

Particulate Emission Rate before controls

2,413 ton/year x year/8,760 hours x 2,000 lbs/ton x 1 hour/192 mmBtu = 2.87 lb/mmBtu

Particulate Emission Rate after controls (Cyclones) and ESP

2,413 ton/year x (1 - 98.22) = 48.26 tons/year

48.26 tons/year x year/8,760 hour x 2,000 lbs/ton = 11.02 lbs/hour

11.02 lbs/hour x hour/192 mmBtu = 0.49 lb/mmBtu

326 IAC 6-2-3(a) Particulate Emission Limitation

$$h = \frac{\sum_{i=1}^{N} H_1 \times pa_i \times Q}{\sum_{i=1}^{N} pa_i \times Q}$$

Where pa = controlled emission rate in lb/mmBtu using the emission factor from AP 42 or stack test data.

$$h = \frac{(192 \times 2.87 \times 367) + (198 \times 2.87 \times 367)}{(2.87)(367) + (2.87)(367)}$$

$$h = 195$$

$$Pt = \frac{(50\ F/m^3)(0.67)(195)}{(76.5)(367^{0.75})(2^{0.25})} = 0.86\ lb/mmBtu$$

Sulfur Dioxide Emission Limitations

Boiler #5
Constructed 1955, 175 mmBtu/hr
Calculated using uncontrolled potential to emit...

2,165 tons/year x year/8,760 hours x 2,000 lbs/ton = 494 lbs/hour

494 lbs/hour x hour/175 mmBtu = 2.82 lbs/mmBtu

Boiler #6
Constructed 1965, 192 mmBtu/hr
Calculated using uncontrolled potential to emit...

2,375 tons/year x year/8,760 hours x 2,000 lbs/ton = 542 lbs/hour

542 lbs/hour x hour/192 mmBtu = 2.82 lbs/mmBtu

NOx Limit for the Diesel-Fired Generator

Usage limit: 96,000 gallons per year of diesel fuel
NOx limit: 40 tons per year
NOx emission factor: 3.2 lb/mmBtu (from AP 42)
Heating value of diesel: 138,000 Btu/gal (from TV application)

$$\frac{96{,}000 \text{ gallons diesel}}{\text{year}} \times \frac{138{,}000 \text{ Btu}}{\text{gal diesel}} \times \frac{3.2 \text{ lb NOx}}{\text{mmBtu}} \times \frac{\text{mm}}{10^6} \times \frac{\text{tons}}{2000 \text{ lbs}}$$

= 21.2 tons per year of NOx

This is below the 40 ton limit.

Particulate Matter Emissions Limitations (326 IAC 6-2-4)

$Pt = \frac{1.09}{Q^{0.26}}$ Pt = pounds of particulate matter emitted per million Btu heat input
Q = Total source maximum operating capacity rating in mmBtu/hr (377)

Pt = 0.20 lb/mmBtu

4.4 tons/year x 1year/8760hour x 2000 lb/ton x 1hour/10mmBtu = 0.10 lb/mmBtu
The source is in compliance with the Pt limit based on the above calculation.

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name: Crawfordsville Electric Light and Power
Source Location: 700 Layfayette Road, Crawfordsville, Indiana 47933
County: Montgomery
SIC Code: 4911
Operation Permit No.: T107-6495-00003
Permit Reviewer: Laura M. Groom

On July 1, 2002, the Office of Air Quality (OAQ) had a notice published in The Journal Revies, Crawfordsville, Indiana, stating that Crawfordsville Electric Light and Power had applied for a Part 70 Operating Permit to operate an electric generating station. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 30th, 2002 Terri Czajka of Ice Miller on behalf of Crawfordsville Electric Light and Power submitted comments on the proposed Title V. The summary of the comments is as follows:

Comment #1: Sections B.7(b) (page 7 of 44), B.11(c)(page 10 of 44), C.9 (page 20 of 44), and perhaps other Sections of the Draft Permit require CEL&P to submit information and conduct stack testing, monitoring, or reporting at any time the Indiana Department of Environmental Management ("IDEM") requests such information, testing, monitoring, or reporting. CEL&P must have the right to object to and to appeal to the Office of Environmental Adjudication ("OEA") any such requests that go beyond specific Permit requirements without being held in violation of its Permit. For example, should IDEM request CEL&P to conduct stack testing beyond that required by Section D.1.6 of the Draft Permit, CEL&P must be allowed the right to object to and to appeal that request without violating its Permit. If such requests are not appealable, then IDEM would be denying CEL&P its constitutional due process rights. As such, for clarification purposes, CEL&P requests that IDEM acknowledge that such requests, if made, would be appealable to OEA under the Administrative Adjudication Act.

Response #1: Affected parties may object to final agency actions and orders under IC 4-21.5. The IDEM's notices of decision regarding such actions and orders include information on filing objections under state law. Additional language in the permit would not affect a party's legal right to object to an agency action. Therefore, it is not necessary to change the permit in response to this comment.

Comment #2: Section B.8 of the Draft Permit (page 8 of 44) states that "[n]on-compliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act." That statement is contrary to law. IDEM does not have the legal authority to grant the United States Environmental Protection Agency ("U.S. EPA") the jurisdiction and authority to enforce a permit provision that the United States Congress has not granted it authority to enforce simply

by failing to designate the provision as not federally enforceable. U.S. EPA may enforce only permit conditions that would constitute a violation of the Federal Clean Air Act and if a permit provision would not otherwise be enforceable under that Act, IDEM cannot make it so merely by failing to so designate it as not federally enforceable in CEL&P's Permit. The Permit instead should state that noncompliance with the Federal Clean Air Act is federally enforceable.

Response #2: The statement "[n]on-compliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act" is not contrary to law. Pursuant to 40 CFR 70.6(b)(1) all terms and conditions in a part 70 permit are enforceable by the Administrator and citizens under the Act. Additionally, 40 CFR 70.6(b)(2) states that the permitting authority shall specifically designate as not being federally enforceable under the Act any terms and conditions included in the permit that are not required under the Act or under any of its applicable requirements.

The IDEM has designated requirements as not being federally enforceable as required by the law. The Permittee had the opportunity during public notice to comment if there were any requirements that were overlooked and should have been designated as not federally enforceable. The Permittee has not indicated any. Therefore, there will be no change to the permit in response to comment number 2.

Comment #3: Sections B.11 (pages 9 - 10 of 44), D.1.5 (page 28 of 44), D.2.3 (page 34 of 44), and D.4.2 (page 37 of 44) of the Draft Permit each require that preventive maintenance plans ("PMPs") be prepared for an entire facility or emissions unit and its control devices, not only for the emission control devices on a facility or emissions unit. IDEM does not have authority to regulate the complete operation and maintenance of an entire facility or emissions unit and IDEM's authority extends only to emission control devices. Consequently, the Draft Permit should be changed to require PMPs only for emission control devices. In this regard, CEL&P respectfully points out that during appeals of many already issued Part 70 Operating Permits, IDEM has agreed that PMPs are required only for emission control devices and for facility operations, if any, that have a direct effect on emissions. In this case, there are no facility operations that have a direct effect on emissions and PMPs should be required only for CEL&Ps emission control devices.

Response #3: The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement found in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3(a)(1)),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

Pursuant to 326 IAC 1-6-1 (Applicability), 326 IAC 1-6-3 applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-1-2 and 326 IAC 2-1-4. Therefore, it is clear from the structure of 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. In additional support of this position, 326 IAC 1-6-5 provides that the commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment. Therefore, it is also clear from the structure of 326 IAC 1-6-5 that the PMP requirement affects the emission unit as well as the control device.

A few examples of situations where an improperly maintained facility would negatively affect emissions would be steam tube leaks, stoker adjustments and combustion air damper settings. These specific situations have the potential to affect particulate and possible nitrogen oxide and carbon monoxide emissions by contributing to incomplete combustion.

There have been no changes to the permit as a result of this comment.

Comment #4: Section B.11(c) of the Draft Permit (page 10 of 44) apparently gives IDEM the authority to review, approve, and require revisions to a PMP whenever IDEM so desires. In addition to the fact that any actions by IDEM in this regard must be appealable (see Comment No. 1, above), CEL&P points out that IDEM is not an expert in the preventive maintenance of CEL&P's equipment, so that this entire permit provision in contrary to law, beyond IDEM's authority, arbitrary, and capricious.

Response #4: The IDEM has authority pursuant to 326 IAC 2-7-5(13) to request a Preventive Maintenance Plan (PMP). An example of a situation when IDEM would request that a PMP be revised would be a situation where lack of proper maintenance causes or contributes to a violation.

Affected parties may object to final agency actions and orders under IC 4-21.5. The IDEM's notices of decision regarding such actions and orders include information on filing objections under state law. Additional language in the permit would not affect a parties legal right to object to an agency action. Therefore, it is not necessary to change the permit in response to this comment.

Comment #5: Section C.11(c) of the Draft Permit (Page 21 of 44) states that "a calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, if possible, "and if this is not possible, visible emissions readings shall be performed. CEL&P understands this to mean that it may perform visible emission readings any time the continuous opacity monitor ("COM") is malfunctioning or will be down for a period of four (4) or more hours and that this Section is not imposing a requirement that CEL&P purchase a backup COM.

Response #5: Please see revision #13 in the latter portion of this addendum for changes that have been made to this condition.

Comment #6: Section C.11(c)(1) (page 21 of 44) of the Draft Permit requires visible emission readings at certain times should the COM malfunction or be down. CEL&P does not have sufficient personnel to perform visible emission readings on weekends and holidays or after 3:00 P.M. on weekdays, should they be required then. It would be unreasonable

burdensome to require that CEL&P hire additional personnel merely because of the possibility that the COM might one weekend or holiday or after 3:00 P.M. on a weekday malfunction or be down for four (4) hours or more. CEL&P points out that historically the COM rarely has been down, making additional personnel even more of an unreasonable burden. There has been one period of 34 hours, 23 minutes COM outage on the boiler #5 monitor due to a power surge. The only other time there has been a COM outage lasting four (4) or more hours, the boiler was off-line, so there was no opacity to capture. Otherwise, the COM has been down for no more than a few minutes for audits and routine maintenance. Consequently, CEL&P reasonably requests that when visible emission readings are required, CEP&P not be required to perform them on weekends and holidays and that when required, they be required during the weekday from 7:00 A.M. to 3:00 P.M. excluding holidays.

Response #6: Please see revision #13 in the latter portion of this addendum for changes that have been made to this condition.

Comment #7: Section C.13(a) of the Draft Permit (pages 21-22 of 44) contains a typographical error in that the following phrase appears twice, one after the other: "any part of the unit or its control device, the gauge employed shall have a scale that..."

Response #7: The IDEM has made the following changes to condition C.13 and has made certain that the phrase above only appears once in the condition:

C.13 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale **such** that **the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading**. ~~adequately ensures compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

Comment #8: Section C.13(b) of the Draft Permit (page 22 of 44) requires that whenever a permit condition requires that the measurement of a temperature, flow, rate, or pH level, the instrument employed must have a scale such that the expected normal reading shall be no less than 20% of full scale and be accurate within plus or minus 2% of full scale reading. This requirement is arbitrary, capricious, and irrational in that not all instruments are capable of meeting this standard. For example, magnahelics normally are accurate within plus or minus 5% of full scale reading.

CEL&P acknowledges that Section C.13(c) of the Draft Permit gives it the opportunity to request IDEM's approval of alternate instrument specifications, but this provision does not adequately address CEL&P's concerns for two reasons. One, at the time the Final Permit is issued, it is possible that CEL&P will be in violation of the Permit because alternate instruments specifications have not yet been approved. A purpose of Part 70 operating permits is to issue permits that address a particular source, not merely permits with boilerplate language. The Permit should address instrumentation CEL&P currently utilizes that does not comply with Section C.13(b) of the Draft Permit. As IDEM is aware, the gauge on CEL&P's baghouse for the cinder removal system is a relatively new gauge that was provided by the baghouse's manufacturer. During normal operations of the baghouse, it is CEL&P's experience that the gauge's normal reading does not stay within 20% of full scale. When the baghouse is cleaned, it operates at

almost zero. The "industry standard" for gauges that IDEM is imposing improperly does not take into account CEL&P's normal operating baghouse, which should be taken into account in the Final Permit that is issued.

Two, the Draft Permit does not include any procedure (including appealability of a denial by IDEM) or standard for demonstrating that an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters, so that it is arbitrary, capricious, and contrary to law.

Response #8: IDEM acknowledges that the Permittee has expressed concern with the procedure for appealing. Affected parties may object to final agency actions and orders under IC 4-21.5. The IDEM's notices of decision regarding such actions and orders include information on filing objections under state law. Additional language in the permit would not affect a parties legal right to object to an agency action. Therefore, it is not necessary to change the permit in response to this comment.

The Permittee has submitted a request for alternate specifications for the baghouse pressure differential. This is because the baghouse that serves the ash collection system operates across a very large range of pressure differential ranging from 0.5 to 29.0 inches of water. The range is dependent upon the type of ash being transferred (bottom ash or fly ash), the degree of automatic cleaning between collection cycles, how long the bags have been in service, and the total vacuum supplied to the baghouse.

The high variable differential pressure is also a factor of the high vacuum that is produced by the steam powered vacuum system that powers the baghouse. The vacuum system that powers the baghouse also powers the system that transfers the ash from the various facilities at the source to the ash silo. This system produces a much higher vacuum to the baghouse than systems utilizing blowers/compressed air sources.

The following changes have been made to condition D.2.6, Baghouse Parametric Monitoring, in response to the high variability of pressure drop range. Should the Permittee need any further changes to their permit regarding this issue, it will need to submit an application for a permit revision.

D.2.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the ash load-in system at least once per shift when the ash load in is in operation when venting to the atmosphere. ~~When for any one reading, the pressure drop across the baghouse is outside the normal range of 18.0 and 24.0 inches of water or a range established within 500 hours of operation after issuance of the permit~~ **When for any one reading during the collection cycle of the ash load-in system the pressure differential across the baghouse exhibits a reading outside of the normal range of 1.0 to 29, inches of water**, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports. A pressure reading outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

Comment #9: Section C.14(c) of the Draft Permit (page 22 of 44) raises two issues. One, should IDEM disapprove an emergency reduction plan ("ERP"), the disapproval must be appealable to OEA and the disapproval itself cannot be the basis for a permit violation.

Two, should IDEM disapprove an ERP, the Draft permit allows CEL&P 30 days to resolve differences and submit an approvable ERP. In addition to the fact that a disapproval must be appealable, based on experience, it is quite possible that IDEM will not be in a position to resolve any differences within 30 days. Yet, if IDEM is not, CEL&P could be in violation of its permit. This situation created by IDEM is arbitrary, capricious, irrational, and contrary to law.

Response #9: The IDEM will evaluate any request for alternative language based on the information provided by the Permittee and other available information. The request should be made as an application for a permit revision. An objection to IDEM's decision on that application can be filed under IC 4-21.5.

Furthermore, disapproval of an ERP would be a final agency action subject to IC 4-21.5. As such the IDEM would include information on appeal procedures as part of its notice of decision. The thirty (30) day deadline to submit an approvable plan is a direct citation of Indiana law at 326 IAC 1-5-2.

Comment #10: There appears to be the same typographical error in both Sections D.1.7 and D.1.8 of the Draft Permit (page 28 of 44). Those Sections should state: "Except as otherwise provided by statute or by rule or in this permit . . ."(missing word to be added is underlined).

Response #10: Conditions D.1.7, Operation of Electrostatic Precipitator and D.1.8, Operation of Multiclone have been changed to add the word "or" in each condition.

D.1.7 Operation of Electrostatic Precipitator [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule **or** in this permit, the electrostatic precipitator for unit 6 shall be operated at all times that the boiler vented to the ESP is in operation.

D.1.8 Operation of Multiclone [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule **or** in this permit, the multiclone for unit 5 shall be operated at all times that the boiler is in operation.

Comment #11: Section D.1.9 of the Draft Permit (page 28 of 44) states that CEL&P "shall demonstrate sulfur dioxide emissions from unit 5 or unit 6 do not exceed 6.0 pounds per mmBtu." CEL&P would like to clarify that this Section requires that the sulfur dioxide emissions from each of those units must not exceed 6.0 pounds per mmBtu and that demonstration must be made for each separate unit. The Draft Permit language is a bit confusing.

Response #11: IDEM would like to clarify in this addendum that both unit 5 and unit 6 each have a limit of 6.0 pounds per mmBtu. If IDEM were to specify each that would require the Permittee to change the fuel analysis plan and method. Currently the source takes one coal sample for both boilers. If we were to specify "each" then the Permittee would be required to take a sample for each boiler from two separate coal piles.

There has been no change to the permit as a result of this comment.

Comment #12: Section D.1.9(a) of the Draft Permit (page 29 of 44 sets forth minimum coal sampling requirements and analysis methods for sulfur dioxide emissions. CEL&P simply would like to confirm that its manual sampling plan that already has been approved by IDEM is consistent with those requirements.

Response #12: The sampling plan submitted by CEL&P appears to be consistent with condition D.1.9(a). The Permittee may choose any of the methods in condition D.1.9 to show compliance.

Comment #13: Section D.1.11 of the Draft Permit (pages 29-30 of 44) and page 13 of 20 of the Technical Support Document mandates the electrostatic precipitator ("ESP") inspections that must be included in CEL&P's PMP. These requirements are arbitrary, capricious, and beyond IDEM's expertise and, as such, should be deleted from the Draft Permit. It is CEL&P's duty to write PMPs, which IDEM has asserted it has the right to review and approve, so the PMP contents should be left to CEL&P. IDEM is not an expert in preventive maintenance of ESPs and certainly is not an expert in CEL&Ps ESP. The inspections IDEM has required are too prescriptive and unreasonable. For example, Section D.1.11(a)(2)(J) of the Draft Permit requires CEL&P to inspect vibrator air pressure settings, but this is not something that even is on CEL&P's ESP. Additionally, because IDEM is attempting to dictate a PMP for CEL&P's ESP, CEL&P will be required to apply for a permit modification each time it changes the ESP to insure the inspections IDEM requires even are applicable. This requirement is unreasonably burdensome and should be deleted from the Draft Permit.

Response #13: IDEM based these inspections on Environmental Protection Agency's (EPA's) Manual titled "Operation and Maintenance Manual for Electrostatic Precipitators" # EPA/625/1-85/017. Since CEL&P's ESP does not have vibrator air pressure settings this will be removed as shown below. At this time CEL&P did not provide any alternative that could be considered. Any further requests for alternate inspections should be addressed with an application for a permit revision.

This condition has been moved to Condition D.1.5, Preventive Maintenance Plan. The rest of the conditions in this section have been renumbered accordingly. The following shows how condition D.1.5 has been changed.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

(a) A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their emission control devices.

~~(a)~~**(b) The PMP for an electrostatic precipitator shall include the following inspections, performed according to the indicated schedules:**

(1) Plate and electrode alignment, every major maintenance outage, but no less than every two years;

(2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed in the last six months. At a minimum, the following inspections shall be performed:

(A) Internal inspection of shell corrosion (i.e., doors, hatches, insulator housings, roof area).
(B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and plates).
(C) Gas distribution (i.e. buildup of dust on distribution plates and turning vanes).

(D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
(E) Major misalignment of plates (i.e., visual check of plate alignment).
(F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.)
(G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.)
(H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration)
(I) TR set controllers (i.e., low voltage trip point, over current trip point, spark rate, etc.)

Comment #14: This Comment also addresses Section D.1.11 of the Draft Permit (page 30 of 44) and the related information on pages 12-13 of 20 of the Technical Support Document. Section D.1.11(a)(1) and Section D.1.11(a)(2)(E) apparently repeat each other.

Response #14: The following changes have been made to condition D.1.11, Preventive Maintenance Plan to clarify when these inspections shall be conducted. These requirements have been moved to condition D.1.5. Also, to delete unnecessary language since the two conditions are being combined and to delete the vibrator air pressure settings.

D.1.11 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

(a) ~~The following inspections shall be performed according to the indicated schedules, in accordance with the Preventive Maintenance Plan prepared in accordance with Section B - Preventive Maintenance Plan:~~

(1) Plate and electrode alignment, **every major maintenance outage, but no less than every two years;** ~~performed annually, not to exceed eighteen (18) months.~~

(2) ESP TR set components, performed **whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed in the last six months.** ~~annually, not to exceed eighteen (18) months between inspections~~. At a minimum, the following inspections shall be performed:

~~(J) Vibrator air pressure settings~~

Comment #15: CEL&P strenuously objects to Section D.1.13 of the Draft Permit (pages 30-31 of 44) in that it improperly imposes on CEL&P more restrictive opacity limits than are imposed by Section C.2 of the Draft Permit (page 19 of 44) and, more importantly, than does 326 IAC 5-1-2. The applicable regulation permits CEL&P's opacity to not exceed an average of 40% in any 1 of 6 minute averaging periods and not to exceed 60% for more than a cumulative total of 15 minutes in a 6 hour period. It is up to CEL&P to assure that it does not violate those limits; should it do so, the appropriate response by IDEM is an enforcement action for violation of the opacity limits. Instead, IDEM has arbitrarily decided that CEL&P's opacity cannot exceed 30% for Unit 5 and 20% for Unit 6 for 3 consecutive 6 minute averaging periods and that if it does, CEL&P must take steps to come below those limits, including reducing its loads. CEL&P should not be required to reduce its loads when it is not exceeding the opacity limits. IDEM may not arbitrarily set different opacity limits and require CEL&P to reduce its loads when it reaches them.

The current proposed response steps limits are not based upon data and information relevant to CEL&P's operations and thus are arbitrary, capricious, irrational, and contrary to law. CEL&P understands that IDEM's intention is to set limits that would require CEL&P to take necessary and reasonable steps to avoid exceeding 40% opacity. Based upon its experience at this source, CEL&P suggests that reasonable response step limits are when the opacity of Unit 5 exceeds 35% and when the opacity of Unit 6 exceeds 30%. IDEM has no experience relative to CEL&P's operations which would allow it to rationally set other limits.

Response #15: The Opacity Readings condition, which has been re-numbered to D.1.12, does not impose an opacity limit, instead it requires a Permittee to take appropriate response steps to avoid exceeding the particulate limit. The IDEM considers opacity to be a "general indicator" for compliance with particulate standards, therefore we are using the trigger levels as a compliance tool.

The IDEM anticipates in the near future that technology will allow for continuous PM monitors. As soon as these are available for purchase a Permittee may choose to use this as a compliance tool, instead of the current opacity trigger level.

The IDEM did not arbitrarily set these opacity trigger levels. These levels were derived from review of data received during recent inspection reports, review of recent stack test summary memos and comparing PM vs. opacity (approximately 5 -10 percent has been added to typical baseline values to arrive at trigger levels).

Comment #16: This Comment is directed toward Sections D.2.1 and D.2.2 of the Draft Permit (pages 33-44 of 44). Basically, IDEM utilized the wrong equation in determining the pounds per hour particulate matter ("PM") limitations for the coal handling processes (Section D.2.1) and the ash handling processes (Section D.2.2). IDEM assumed process weight rates up to 60,000 pounds per hour, but the process weight rates for this facility actually exceed 60,000 pounds per hour, so 326 IAC 6-4-1, an equation different from that which IDEM utilized must be utilized. CEL&P suggests that IDEM utilized the wrong equation because IDEM's description of the coal and ash storage and handling facility is incomplete. The correct description is as follows (additions underlined; deletions struck out):

Coal and ash storage and handling consisting of the following systems:

a) One (1) 1.13 acre outdoor coal storage area with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.

b) One (1) coal unloading system which consists of end dump semi trailer trucks <u>with a maximum throughput of 110 tons per hour</u> and ~~has~~ a maximum annual throughput of 140,000 tons per year.

c) One (1) coal reclaim, transfer and conveying system, which has an internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader) Transfer to reclaim hopper, followed by conveyor transfer to bunkers, storage capacity for the external coal bunker is 100 tons. The maximum ~~annual~~ throughput is <u>200 tons per hour and</u> 140,000 tons per

year.

d) One (1) ash handling load out system with inside storage and wetting and a storage capacity of 100 tons. The maximum ~~annual~~ throughput is 50 tons per hour and 21,000 tons per year. The dust during silo load out to the trucks is controlled with pug mill wetting and spray bars.

e) One (1) ash handling load in system with enclosed silo storage and a storage capacity of 100 tons. Emissions are controlled by a baghouse. The maximum ~~annual~~ throughput is 14 tons per hour and 21,000 tons per year.

Using the correct description, it is not clear that the PM emission rates and process weight rates in the Draft Permit are incorrect. Sections D.2.1 and D.2.2 should read as follows:

Section D.2.1

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the coal handling processes shall not exceed 58.5 pounds per hour when operating at a process weight rate of 200 tons per hour.

The pounds per hour limitation was calculated using the following equation:

$E = 55.0P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Section D.2.2

Pursuant to 326 IAC 6-3-2, the allowable PM emission rate from the ash handling processes shall not exceed 44.6 pounds per hour when operating at a process weight rate of 50 tons per hour.

The pounds per hour limitation was calculated using the following equation:

$E = 55.0P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Response 16: The IDEM used the information submitted in the Title V application to create descriptions. Based on additional information received from the Permittee the IDEM is changing the descriptions throughout the permit as shown below. Also, the correct equation and the appropriate pounds per hour particulate emission limit for the coal and ash handling processes have been revised as shown below and the word “matter” has been deleted to be consistent with recent rule changes. The processes that the equations apply to have been specified.

The Office of Air Quality prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support Document. That accomplishes the desired result of ensuring that these types of

concerns are documented and part of the record regarding this permit decision.

Coal and ash storage and handling consisting of the following systems:

1) One (1) 1.13 acre outdoor coal storage pile with a storage capacity of 18,700 tons and a maximum annual throughput of 140,000 tons per year.
2) One (1) coal unloading system which consists of end dump semi trailer trucks **with a maximum throughput of 110 tons per hour** and ~~has~~ a maximum annual throughput of 140,000 tons per year.
3) One (1) coal reclaim, transfer and conveying system, which has internal storage silos with a capacity of 700 tons. The method of handling is manual (Pay Loader)Transfer to reclaim hopper, followed by conveyor transfer to bunkers, storage capacity for the external coal bunker is 100 tons. The maximum ~~annual~~ throughput is **200 tons per hour and** 140,000 tons per year.
4) One (1) ash handling load out system with inside storage and wetting and a storage capacity of 100 tons. The maximum ~~annual~~ throughput is **50 tons per hour and** 21,000 tons per year. The dust during silo load out to the trucks is controlled with pug mill wetting and spray bars.
5) One (1) ash handling load in system with enclosed silo storage and a storage capacity of 100 tons. The maximum ~~annual~~ throughput is **14 tons per hour and** 21,000 tons per year. The dust during pneumatic conveying is controlled with a primary cyclone ash separator/fabric filter baghouse.

D.2.1 Particulate ~~Matter~~ Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable ~~PM~~ particulate emission rate from the coal ~~handling processes~~ **unloading and the reclaim, transfer and conveying system** shall not exceed ~~26.3~~ **58.5** pounds per hour when operating at a process weight rate of ~~16.0~~ **200** tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate ~~up to~~ **in excess of** sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = ~~4.10 P^{0.67}~~ \mathbf{55.0P^{0.11}-40}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

D.2.2 Particulate ~~Matter~~ Emissions Limitations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the allowable ~~PM~~ particulate emission rate from the ash ~~handling processes~~ **load out and load in system** shall not exceed ~~7.4~~ **44.6** pounds per hour when operating at a process weight rate of ~~2.4~~ **50** tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate ~~up to~~ **in excess of** sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = ~~4.10 P^{0.67}~~ \mathbf{55.0P^{0.11} - 40}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Comment #17: Section D.2.5 of the Draft Permit (Page 34 of 44) is unduly burdensome. CEL&P suggests that weekly visible emission notations are more than adequate. Also, as to Subsection (b), the ash handling system, coal unloading system, coal storage area, and

coal transfer system are not point sources, so that opacity limits and monitoring requirements are not applicable. There is no purpose to recording whether these emissions are normal or abnormal and the requirement is onerous. CEL&P estimates that it would take 30 to 50 minutes each day to gather this information. Additionally, these systems and area do not operate every day, so if CEL&P is required to make visible emission notations of them, the Permit should be clear that this need not be done on days they do not operate.

Response #17: The IDEM disagrees that this requirement is unduly burdensome. Especially when one considers that there have been complaints from surrounding residents of excessive soot and dust coming from CEL&P. The purpose for recording whether these emissions are normal or abnormal is to ensure that the Permittee is monitoring these facilities.

The Permittee has expressed concern because these facilities do not operate daily. Subsection (a) of this condition states "when exhausting to the atmosphere", which requires records to be kept only during operation. Subsection (b) of this condition states "during normal daylight operations" which requires keeping records of VE's during daylight and when operating. Therefore, the Permittee is not required to conduct visible emissions notations when these systems are not operating and can indicate non-operational times in the records.

Comment #18: Section D.2.6(b) of the Draft Permit (page 35 of 44) requires that instruments used for determining baghouse pressure be calibrated at least once every 6 months. This requirement is arbitrary and capricious and beyond IDEM's expertise. CEL&P should be required to calibrate its instruments in accordance with manufacturer's recommendations; IDEM is not more qualified than the manufacturer in this regard. Additionally, based on its actual experience with these gauges, calibration is not required more than annually. IDEM is not more experienced than is CEL&P in operation of its gauges. So a rational requirement would be that pressure gauges be calibrated in accordance with manufacturer's requirements or annually, not to exceed 18 months between calibrations.

Response #18: The D.2.6, Baghouse Parametric Monitoring condition has been changed to delete the Six (6) month calibration requirement. The changes shown below now require a Permittee to calibrate the instrument used for determining the pressure in accordance with manufacturer's specifications.

D.2.6 Baghouse Parametric Monitoring [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(b) ~~The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.~~ **The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, and shall be calibrated in accordance with the manufacturer's specifications. The specifications shall be available on site with the Preventive Maintenance Plan.**

Technical Support Document

The Office of Air Quality prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are

documented in this Addendum to the Technical Support Document. That accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Comment #19: This comment is directed toward the Insignificant Activities list in the Technical Support Document ("TSD"), specifically Subsection (w) (page 4 of 20). The list includes on-site fire and emergency response training approved by the department as an insignificant activity, but this is not an activity that takes place at CEL&P. The only possible related training is fire extinguisher training and such training is not subject to IDEM approval. So, this should be deleted from the Draft Permit.

Response #19: The following strikeout shall serve as documentation for what the TSD should now read. On-site fire and emergency response training was included in the TSD as an insignificant activity because it was listed by the Permittee in the Title V application. Since the Permittee has commented that these activities are not at CEL&P, it is stated in this addendum that "On-site fire and emergency response training do not take place at Crawfordsville Electric Light and Power.

~~W. On-site fire and emergency response training approved by the department.~~

Comment #20: This Comment is directed toward the Actual Emissions listed in the TSD (page 6 of 20). The actual HAP emissions are 14 tons per year, not 26 tons per year.

Response #20: The following change shall serve as documentation for what the TSD should now read.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2000 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	44
PM-10	11
SO_2	417
VOC	0
CO	31
NO_x	85
HAP (specify)	~~26~~ **14**

Comment #21: This comment is directed toward the Potential To Emit After Issuance contained in the TSD (page 6 of 20; see also page 10 of 20 regarding SO_2). CEL&P's potential after Permit issuance is either a federally enforceable limit or the maximum capability of its equipment, but the potentials to emit identified in the TSD are neither of those, so are not correct. For example, the TSD identifies the potential to emit NOx for the diesel-fired generator as 140 tons per year, yet according to pages 11 and 20 of the TSD and Section D.4.1 of the Draft Permit (page 37 of 44), its potential to emit is below 40 tons per year due to operational limits on the diesel-fired generators. This is merely an example; all of the potentials to emit in the TSD are incorrect and do not reflect either a federally enforceable limit or the capability of the equipment. See also pages 17-18 of the TSD.

Response #21: The following changes shall serve as documentation for what the TSD should now read. You will find an updated potential to emit table that is more general and includes NOx limit of less than 40 tons per year for the diesel-fired generator.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 operating permit.

	Potential to Emit						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
~~Unit 5~~	~~374~~	~~142~~	~~2,165~~	~~2~~	~~166~~	~~366~~	~~45~~
~~Unit 6~~	~~48~~	~~75~~	~~2,376~~	~~3~~	~~182~~	~~402~~	~~50~~
~~Coal Handling Operations~~	~~33~~	~~16~~	~~- - -~~	~~- - -~~	~~- - -~~	~~- - -~~	~~- - -~~
~~Ash Handling Operation~~	~~63~~	~~32~~	~~- - -~~	~~- - -~~	~~- - -~~	~~- - -~~	~~- - -~~
~~Diesel-fired Generator~~	~~4~~	~~10~~	~~11~~	~~4~~	~~37~~	~~140~~	~~- - -~~
~~Total Emissions~~	~~522~~	~~275~~	~~4,552~~	~~9~~	~~385~~	~~908~~	~~95~~

	Potential to Emit						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Pre - 1977 Equipment (Unit 5, Unit 6, Coal and Ash Handling Operations	**greater than 100**	**greater than 100**	**greater than 100**	**less than 100**	**greater than 100**	**greater than 100**	**greater than 25**
Diesel-fired Generator	**- - -**	**- - -**	**- - -**	**- - -**	**- - -**	**less than 40**	**- - -**

Total Emissions	**greater than 100**	**greater than 100**	**greater than 100**	**less than 100**	**greater than 100**	**greater than 100**	**greater than 25**

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table of Contents has been modified to reflect these changes.

(1.) In condition A.1, the Responsible Official name has been changed to a title instead of a particular individual. This was done in an effort to reduce future amendments to the permit. Also, additional source status is shown below.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary electric generating station.

Responsible Official:	~~Mr. Roy E. Kaser~~ **Utility Manager**
Source Address:	700 Layfayette Road, Crawfordsville, Indiana 47933
Mailing Address:	808 Layfayette Rd., P.O. Box 428, Crawfordsville, IN 47933
General Source Phone Number:	(317)362-1900
SIC Code:	4911
County Location:	Montgomery
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules **Major Source, Section 112 of the Clean Air Act** 1 of 28 Source Categories

(2.) The following changes were made to condition B.2, Permit Term. These changes were made in order to avoid confusion for renewals as to what "original" date the IDEM is referring to.

B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date **of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit or of permits issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(3.) The following changes were made to condition B.7, Duty to Supplement and Provide Information. The last sentence of (b) was revised to remove the statement about confidential information, and (c) was updated for clarity.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit**.** ~~or, for~~

~~information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]~~

(c) **For information furnished by the Permittee to IDEM, OAQ**, ~~T~~**t**he Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

(4.) The following changes were made to condition B.11, Preventive Maintenance Plan. These changes were made because it is not necessary to state twice that the PMP does not need to be certified, since it is more appropriate to state in (c), it has been removed from (a).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

The PMP ~~and the PMP~~ extension notification do**es** not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(5.) The following changes were made to condition B.12, Emergency Provisions. These changes were made correct the rule cite and to move the requirement to include emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.12 Emergency Provisions [326 IAC 2-7-16]

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(~~10~~**9**) be revised in response to an emergency.

(h) **The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.**

(6.) The following change has been made to condition B.13, Permit Shield. This change was made to correct the rule cite.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(~~7~~**8**)]

(7.) Condition B.14, Prior Permits Superseded condition has been changed to add language to clarify the Acid Rain Permits are not superseded by the Title V permits.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1.) incorporated as originally stated,

(2.) revised, or

(3.) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit **except for permits**

issued pursuant to Title IV of the Clean Air Act and 326 IAC 21 (Acid Deposition Control).

(8.) The permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. Therefore, the following change has been made to condition B.15, Deviations from Permit Requirements and Conditions.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

~~(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.~~

(9.) The B.20, Permit Revision Under Economic Incentives and Other Programs condition has been revised to correct a rule cite. The change is shown below.

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)~~(D)(i)~~ and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

(10.) The following change has been made to condition B.21, Operational Flexibility in order to be consistent with 326 IAC 2-7-20(a)(4).

B.21 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b)**(1)**, (c)(1), and (e)(2).

(11.) The following changes have been made to condition B.24, Annual Fee Payment. These changes have been made because 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-7; therefore, this rule cite is being added to B.24. Also, the section and phone number of who the Permittee can contact has been corrected in (c).

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)] **[326 IAC 2-1.1-7]**

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-~~0425~~ **4230** (ask for OAQ, ~~Technical Support and Modeling Section~~ **I/M & Billng Section**), to determine the appropriate permit fee.

(12.) The following changes have been made to condition C.1, Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour to be consistent with the rule revision of 326 IAC 6-3-2.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2] **[40 CFR 52 Subpart P]**

(a) Pursuant to ~~326 IAC 6-3-2~~ **40 CFR 52 Subpart P**, the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. This condition is not federally enforceable.

(13.) Condition C.11, Maintenance of Continuous Opacity Monitoring Equipment has been changed to allow the Permittee a longer period of time to get the Continuous Opacity Monitor (COM) on-line or to get a Certified Opacity Reader to the Source to read opacity.

C.11 Maintenance of Continuous Opacity Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) The Permittee shall install, calibrate, maintain, and operate all necessary continuous opacity monitoring systems and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

(b) In the event that a breakdown of the continuous opacity monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem.

(c) Whenever a continuous opacity monitor is malfunctioning or will be down for calibration, maintenance, or repairs for a period of four (4) hours or more, compliance shall be determined by one of the following:

(1) ~~A calibrated backup COM shall be brought online within four (4) hours of shutdown of the primary COM, or~~
Visible emission (VE) notations shall be performed once per hour during daylight operations following the shutdown or malfunction of the primary COM. A trained employee shall record whether emissions are normal or abnormal for the state of operation of the boiler at the time of the reading.

(A) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(B) If abnormal emissions are noted during two consecutive emission

notations, the Permittee shall begin Method 9 opacity observations with four hours of the second abnormal notation.

(C) VE notations may be discontinued once a COM is online or formal Method 9 readings have been implemented.

(2) ~~Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of one (1) hour beginning four (4) hours after the start of the malfunction or down time.~~
If a COM is not online within twenty-four (24) hours of shutdown or malfunction of the primary COM, the Permittee shall provide certified opacity reader(s), who may be employees of the Permittee or independent contractors, to self-monitor the emissions from the boiler stack.

(A) ~~If the reading period begins less than one hour before sunset, readings shall be performed until sunset. If the first required reading period would occur between sunset and sunrise, the first reading shall be performed as soon as there is sufficient daylight.~~
Visible emission readings shall be performed in accordance with 40 CFR 60, Appendix A, Method 9, for a minimum of five (5) consecutive six (6) minute averaging periods beginning not more than twenty -four (24) hours after the start of the malfunction or down time.

(B) Method 9 opacity readings shall be repeated for a minimum of ~~one (1)~~ **five (5) consecutive six (6) minute averaging periods** ~~hour~~ at least once every four (4) hours during daylight operations, until such time that the continuous opacity monitor is back in operation.

(C) Method 9 reading may be discontinued once a COM is online.

~~(C) All of the opacity readings during this period shall be reported in the Quarterly Deviation and Compliance Monitoring Reports.~~

(3) If abnormal emissions are observed at any boiler exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of abnormal emissions that do not violate an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(4) All of the opacity readings during this period shall be reported with the Quarterly Opacity Exceedances Reports.

(d) Nothing in this condition, or in Section D of this permit, shall excuse the Permittee from complying with the requirements to operate a continuous opacity monitor system pursuant to 326 IAC 3-5.

(14.) Condition C.22, Application Requirements for Section 112(j) of the Clean Air Act, has been added to the permit. The table of contents have been updated also.

C.22 Application Requirements for Section 112(j) of the Clean Air Act [40 CFR 63.52(e)] [40 CFR 63.56(a)] [40 CFR 63.9(b)] [326 IAC 2-7-12]

(a) The Permittee shall submit a Part 2 Maximum Achievable Control Technology (MACT) Application in accordance with 40 CFR 63.52(e)(1). The Part 2 MACT Application shall meet the requirements of 40 CFR 63.53(b).

(b) Notwithstanding paragraph (a), the Permittee is not required to submit a Part 2 MACT Application if the Permittee no longer meets the applicability criteria of 40 CFR 63.50 by the application deadline in 40 CFR 63.52(e)(1). For example, the Permittee would not have to submit a Part 2 MACT Application if, by the application deadline:

(1) The source is no longer a major source of hazardous air pollutants, as defined in 40 CFR 63.2;

(2) The source no longer includes one or more units in an affected source category for which the U.S. EPA failed to promulgate an emission standard by May 15, 2002; or

(3) The MACT standard or standards for the affected source categories included at the source are promulgated.

(c) Notwithstanding paragraph (a), pursuant to 40 CFR 63.56(a), the Permittee shall comply with an applicable promulgated MACT standard in accordance with the schedule provided in the MACT standard if the MACT standard is promulgated prior to the Part 2 MACT Application deadline or prior to the issuance of permit with a case-by-case Section 112(j) MACT determination. The MACT requirements include the applicable General Provisions requirements of 40 CFR 64, Subpart A. Pursuant to 40 CFR 63.9(b), the Permittee shall submit an initial notification not later than 120 days after the effective date of the MACT, unless the MACT specifies otherwise. The initial notification shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United State Environmental Protection Agency, Region V
Director, Air and Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(15.) The following changes have been made to condition D.1.1, Particulate Matter Emissions Limitations for Sources of Indirect Heating. These changes were done to make the language consistent with the rule.

D.1.1 Particulate ~~Matter~~ Emission~~s~~ Limitations **for Sources of Indirect Heating** [326 IAC 6-2-3(d)]

Pursuant to 326 IAC 6-2-3(d) (Particulate ~~Matter~~ Emission~~s~~ **Limitations** for Sources of Indirect Heating), particulate matter from any facility used for indirect heating purposes which were existing on or before June 8, 1972, shall in no case exceed 0.8 lb/mmBtu heat input.

(16.) The following changes were made to the D.1.5, Preventive Maintenance Plan Condition. These changes were made to clarify that there is more than one (1) emission unit and control device. Also, condition D.1.14, Preventive Inspections: Multiclone from the Compliance Monitoring Requirements to the Preventive Maintenance Plan Condition. The rest of the conditions in the section and the table of contents have been renumbered accordingly.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

(a) A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for ~~this~~ **these** ~~facility~~ **facilities** and ~~any~~ **their** emission control devices.

(b) The PMP for an electrostatic precipitator shall include the following inspections, performed according to the indicated schedules.

(1) Plate and electrode alignment, every major maintenance outage, but no less than every two years;

(2) ESP TR set components, performed whenever there is an outage of any nature lasting more than three days, unless such inspections have been performed in the last six months. At a minimum, the following inspections shall be performed:

(A) Internal inspection of shell corrosion (i.e., doors, hatches, insulator housings, roof area).
(B) Effectiveness of rapping (i.e., buildup of dust on discharge electrodes and plates).
(C) Gas distribution (i.e. buildup of dust on distribution plates and turning vanes).
(D) Dust accumulation (i.e., buildup of dust on shell and support members that could result in grounds or promote advanced corrosion).
(E) Major misalignment of plates (i.e., visual check of plate alignment).
(F) Rapper, vibrator and TR set control cabinets (motors, lubrication, etc.)
(G) Rapper assembly (i.e., loose bolts, ground wires, water in air lines, solenoids, etc.)
(H) Vibrator and rapper seals (i.e., air in-leakage, wear, deterioration)
(I) TR set controllers (i.e., low voltage trip point, over current trip point, spark rate, etc.)

(3) Air and water infiltration, once/month. The recommended method for this inspection is for audible checks around ash hoppers/hatches, duct expansion joints, and areas of corrosion.

(c) An inspection of the internal components of the multiclone shall be conducted at least every two (2) years, or 6000 hours of operation, whichever occurs first, in accordance with the Section B - Preventive Maintenance Plan. Items to be checked include air infiltration, plugging of inlet spinner vanes, outlet tube erosion, deposits on the inside surfaces of the cyclone tubes, and plugging of the bottom of the cyclone tubes.

(d) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports for any improper or abnormal conditions found during the multiclone inspection. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(17.) The following changes were made to the D.1.6, Testing Requirements Condition. These changes were made to clarify that a Source does not have to test every two (2) years to the date, but every two (2) calendar years.

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within ~~a~~ **the** two (2) **calendar** year**s** ~~period from~~ **following** the most recent stack test, compliance with the PM limitation in Condition D.1.1 shall be determined by a performance stack test using methods as approved by the commissioner. This test shall be repeated at least once every two (2) **calendar** years from the date of this valid compliance demonstration. Testing shall be conducted in accordance with Section C - Performance Testing.

(18.) The following changes have been made to condition D.1.9, Sulfur Dioxide Emissions and Sulfur Content.

D.1.9 Sulfur Dioxide Emissions and Sulfur Content [326 IAC ~~2-7-5(3)(A)~~**7-2**] ~~[326 IAC 2-7-6] [326 IAC 3]~~ **[326 IAC 7-1.1-2]**

Pursuant to 326 IAC 7-2**-1**, the Permittee shall demonstrate that the sulfur dioxide emissions from unit 5 or unit 6 do not exceed **the equivalent of** 6.0 pounds per mmBtu **demonstrated using a calendar month average**. ~~Compliance shall be determined utilizing one of the following options:~~ **Pursuant to 326 IAC 7-2-1(e) and 326 IAC 3-7, coal sampling and analysis data shall be collected as follows:**

~~(a) Coal sampling and analysis shall be performed using one of the following procedures:~~

~~(1) Minimum Coal Sampling Requirements and Analysis Methods [326 IAC 3-7-2(b)]:~~

(1) Pursuant to 326 IAC 3-7-2(b)(1), the Permittee shall comply with the requirements specified in 326 IAC 3-7-2(a); or

(2) Pursuant to 326 IAC 3-7-2(b)(2) and 326 IAC 3-7-3, manual or other non-ASTM automatic sampling and analysis procedures may be used upon a demonstration, submitted to the department for approval, that such procedures provide sulfur dioxide emission estimates representative either of estimates based on coal sampling and analysis procedures specifies in 326 IAC 3-7-2 or of continuous emissions monitoring; or

(3) Pursuant to 326 IAC 3-7-2(b)(3), the Permittee shall meet the following minimum requirements:

(A) The coal sample acquisition point shall be at a location where representative samples of the total coal flow to be combusted by the facility or facilities may be obtained. A single as-bunkered sampling station may be used to represent the coal to be combusted by multiple

facilities using the same stockpile feed system.

(B) Coal shall be sampled at least three (3) times per day and at least one (1) time per eight (8) hour period unless no coal is bunkered during the preceding eight (8) hour period.

(C) Minimum sample size shall be five hundred (500) grams.

(D) Samples shall be composited and analyzed at the end of each calendar month.

~~(E) Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d) and (e).~~

For options (a)(1) and (a)(3) of this condition, the coal samples shall be prepared as specified in 326 IAC 3-7-2(c), the heat content of the coal samples shall be determined as specified in 326 IAC 3-7-2(d), and the sulfur content of the coal samples shall be determined pursuant to 326 IAC 3-7-2(e).

~~(2) Sample and analyze the coal pursuant to 326 IAC 3-7-2(a). Preparation of the coal sample, heat content analysis, and sulfur content analysis shall be determined pursuant to 326 IAC 3-7-2(c), (d) and (e);~~

~~(3) Sample and analyze the coal pursuant to 326 IAC 3-7-3; or~~

(b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the boiler in accordance with 326 IAC 3-6, utilizing the procedures in 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8. [326 IAC 7-2-1(d)]

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method. [326 IAC 7-2-1(f)]

(c) Upon written notification to IDEM by a facility owner or operator, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5-1 may be used as the means for determining compliance with the emission limitations in 326 IAC 7-2. Upon such notification, the other requirements of 326 IAC 7-2 shall not apply. [326 IAC 7-2-1(g)]

(19.) The following changes have been made to condition D.1.12, Opacity Readings. These changes were made to make the condition more concise.

D.1.12 Opacity Readings [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) ~~Appropriate response steps shall be taken in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records and Reports whenever the opacity of Unit 5 exceeds thirty percent (30%) or the opacity of Unit 6 exceeds twenty percent (20%) for three (3) consecutive six (6) minute averaging periods.~~ **In the event of opacity for Unit 5 exceeding thirty percent (30%) average opacity for three (3) consecutive six (6) minute averaging periods or the opacity for Unit 6 exceeding twenty percent (20%) average opacity for three (3) consecutive six (6) minute averaging periods**, **appropriate** response steps **shall** ~~will~~ be taken such that the causes of the excursion are identified and corrected and opacity levels are brought back below thirty percent (30%) for Unit 5 and twenty percent (20%) for Unit 6. Examples of

expected corrective actions include, but are not limited to, boiler loads being reduced and ESP T-R sets being returned to service.

(b) Opacity readings in excess of thirty percent (30%) for Unit 5 or twenty percent (20%) for Unit 6 but not exceeding the opacity limit for the unit are not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(20.) The following changes made to the Monitoring: Multiclone condition, now re-numbered D.1.13. These changes were made to add the bolded words shown below.

D.1.15~~3~~ **3** Monitoring: Multiclone [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) The ability of the multiclone to control particulate emissions from unit 5 shall be monitored at least once per shift, when the unit is in operation, by measuring and recording the **total** static pressure drop across the multiclone. Pressure drop monitoring equipment shall be installed in accordance with Section C - Compliance Monitoring.

(b) Normal operating range will be determined within the first two hundred (200) hours of boiler operation after installation of the pressure drop monitoring equipment. The IDEM shall be notified within the first two hundred (200) hours of this determination.

(c) Reasonable response steps shall be taken in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports whenever the static pressure drop is outside of the normal operating range for the corresponding boiler steam load. A pressure drop reading that is outside normal range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(21.) The following changes were made to the Record Keeping Requirements condition, which has been re-numbered as D.1.14. These changes were made to cite the Section C - Opacity reference because this permit does not have the opacity limit duplicated in the D Section. D.1.16(c)(6) has been deleted because keeping records of response steps is already required by section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports; including it here might be misinterpreted as requiring the same information to be kept in multiple logs.

D.1.16~~4~~ **4** Record Keeping Requirements

(a) To document compliance with Conditions D.1.3 and D.1.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be sufficient to demonstrate compliance using a thirty (30) day rolling weighted average and shall be complete and sufficient to establish compliance with the SO_2 limit established in Condition D.1.3.

(1) Calendar dates covered in the compliance determination period;

(2) Actual coal usage since last compliance determination period;

(3) Sulfur content and heat content; **and**

(4) Sulfur dioxide emission rates.

(b) Pursuant to 326 IAC 3-7-5(a), the Permittee shall develop a standard operating procedure (SOP) to be followed for sampling, handling, analysis, quality control, quality assurance, and data reporting of the information collected pursuant to 326 IAC 3-7-2 through 326 IAC 3-7-4. In addition, any revision to the SOP shall be submitted to IDEM, OAQ.

(c) To document compliance with **Section C - Opacity** and Conditions D.1.1, D.1.2, D.1.4, D.1.5, D.1.6, D.1.10, D.1.11, D.1.12, D.1.13, D.1.14 and D.1.15, the Permittee shall maintain records in accordance with (1) through (~~6~~**5**) below. Records shall be complete and sufficient to establish compliance with the limits established in Section C - Opacity and in Conditions D.1.1 and D.1.2.

(1) Data and results from the most recent stack test;

(2) All continuous emissions monitoring data, pursuant to 326 IAC 3-5;

(3) All parametric monitoring readings;

(4) Records of the results of the ESP and multiclone inspections; **and**

(5) All preventive maintenance measures taken~~; and~~

~~(6) All response steps taken and the outcome for each.~~

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(22.) The following change was made to Reporting Requirements condition, which has been re-numbered as D.1.15. This change was made because reports to document opacity exceedances will be required in quarters when the limit has been exceeded.

D.1.1~~7~~**5** Reporting Requirements

(a) A quarterly ~~summary of the information to document compliance with~~ **report of opacity exceedances and a quarterly summary of the information to document compliance with** Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(23.) The D.2.5, Visible Emissions Notations condition has been changed to reference the fugitive dust rule and to be add a subsection that addresses visible emissions from the coal unloading station doorways. The changes are shown below.

D.2.5 Visible Emissions Notations [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

(a) Visible emission notations of the baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) Visible emission notations of the ash handling system, coal unloading system, coal

storage area and coal transfer system shall be performed at least once per day during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(c) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation.

(d) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(e) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(f) If visible emissions are observed crossing the property line or boundaries of the property, right-of-way, or easement on which the source is located, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports.

(g) If abnormal emissions are observed at any baghouse exhaust, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records, and Reports. Observation of ~~an~~ abnormal ~~emission~~ **emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit** is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(h) If any visible emissions of dust are observed from the coal unloading station doorways, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Observation of visible emissions that do not violate 326 IAC 6-4 (Fugitive Dust Emissions) or an applicable opacity limit is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(24.) The following language has been added to condition D.2.7, Broken or Failed Bag Detection.

D.2.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

For single compartment baghouses, **if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then** failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(25.) The following change has been made to the D.2.8, Baghouse Inspections condition. This change was made to update clarify how frequently the inspection should occur.

D.2.8 Baghouse Inspections

(a) An inspection shall be performed **within the last month of** each calendar quarter of all bags controlling particulate emissions from the ash load in processes. All defective bags shall be replaced.

(b) If an abnormal or improper condition is found during an inspection, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. Discovery of an abnormal or improper condition is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

(26.) The following changes have been made to the D.2.9, Record Keeping Requirements condition. These changes were made to specify how frequently the records should be kept and for additional clarification on what records IDEM expects.

D.2.9 Record Keeping Requirements

(a) To document compliance with Condition D.2.5, the Permittee shall maintain records of the **once per shift** visible emission notations of the baghouse stack exhaust.

(b) To document compliance with Conditions D.2.6 and D.2.8, the Permittee shall maintain the following:

(1) Records of the ~~differential~~ **total static** pressure **drop** readings across the baghouse; and
(2) Records of the results of the baghouse inspections.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

(27.) The following should have been included in the TSD, to explain why the NOx Budget Trading Program is not applicable to this unit 5 and unit 6 at this Source.

326 IAC 10-4 (NOx Budget Trading Program)
These units are not subject to 326 IAC 10-4-1 because they are not "Electricity Generating Units" or " EGU's" as defined in 326 IAC 10-4-2(16) and they are not a "large affected units" as defined in 326 IAC 10-4-2(27). The units are not "EGU's" because they commenced operation prior to January 1, 1997 but did not serve a generator during 1995 or 1996 that had a nameplate capacity greater than twenty-five (25) megawatts that produced electricity for sale under a firm contract to the electric grid. Additionally, the units are not considered "Large Affected Units" because they are each less than 250 mmBtu.

(28.) The following indicates what should have been included in the TSD to explain why the Sulfur dioxide ambient monitoring rules are not applicable to this Source.

326 IAC 7-3-1 (Sulfur Dioxide Ambient Monitoring)
The Source is not subject to the sulfur dioxide ambient monitoring requirements because the actual sulfur dioxide emissions are less than 10,000 tons per year.

Appendix A: Emissions Calculations

Coal Combustion: Bituminous Coal for Boilers (Spreader Stoker)

Company Name: Crawfordsville Electric Light and Power

Address, City, IN, Zip: 700 Lafayette Road, Crawfordsville, Indiana 47993

Title V: T107-6495-00003

Reviewer: Laura M. Groom

Date: March 2001

Heat Input Capacity MMBtu/hr		Heat Content of Coal Btu/lb of Coal	Potential Throughput tons/year		Weight % Sulfur in Fuel	
175	#5	11,500	66,652	S =	1.7	%
				A=	7.82	%
				Multiclone Mechanical Separator	83.2%	%

	Pollutant									
	PM	PM10	SO2	NOx	VOC	CO	HCl	HF	As	Lead
Emission Factor in lb/ton	66.0	13.20	65.0 (38S)	11.0	0.07	5.00	1.2	0.15	0.00041	0.00042
Potential Emission in tons/yr	**2199.5**	**439.9**	**2165.5**	**366.6**	**2.3**	**166.6**	**4.00E+01**	**5.00E+00**	**1.37E-02**	**1.40E-02**

Emission Factors are from AP 42 (Update 9/98), Tables 1.1 -4, 1.1-3 and 1.1-18 (SCC 1-01-002-04/24, 1-02-002-04/24, 1-03-002-09/24)

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x 8,760 hrs/yr

Heat Content of the Coal is taken from the application

Additional emission factors for commercial/institutional and electric generation boilers are available in AP-42, Chapter 1.1.

Several HAPs emission factors are also available in AP-42, Chapter 1.1, depending on the type of boiler.

Emission (tons/yr) = Throughput tons per year x Emission Factor (lb/ton) / 2,000 lb/ton

Emissions (lbs/MMBtu) = 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x Emission Factor (lb/ton)

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations

Coal Combustion: Bituminous Coal for Boilers (Spreader Stoker)

Company Name: Crawfordsville Electric Light and Power

Address, City, IN, Zip: 700 Lafayette Road, Crawfordsville, Indiana 47993

Title V: T107-6495-00003

Reviewer: Laura M. Groom

Date: March 2001

Heat Input Capacity MMBtu/hr		Heat Content of Coal Btu/lb of Coal	Potential Throughput tons/year	Weight % Sulfur in Fuel		
192	#6	11,500	73,127	S =	1.7	%
				A=	7.82	%
				ESP Control Efficiency	98.2%	%

	Pollutant									
	PM	PM10	SO2	NOx	VOC	CO	Magnesium	Hf	As	HcL
Emission Factor in lb/ton	66.0	13.20	65.0 (38S)	11.0	0.07	5.00	0.01	0.15	0.00041	1.2
Potential Emission in tons/yr	**2413.2**	**482.6**	**2375.9**	**402.2**	**2.6**	**182.8**	**3.66E-01**	**5.48E+00**	**1.50E-02**	**4.39E+01**

Emission Factors are from AP 42 (Update 9/98), Tables 1.1 -4, 1.1-3 and 1.1-18 (SCC 1-01-002-04/24, 1-02-002-04/24, 1-03-002-09/24)

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x 8,760 hrs/yr

Heat Content of the Coal is taken from the application

Additional emission factors for commercial/institutional and electric generation boilers are available in AP-42, Chapter 1.1.

Several HAPs emission factors are also available in AP-42, Chapter 1.1, depending on the type of boiler.

Emission (tons/yr) = Throughput tons per year x Emission Factor (lb/ton) / 2,000 lb/ton

Emissions (lbs/MMBtu) = 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x Emission Factor (lb/ton)

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations

Coal Combustion: Bituminous Coal for Boilers (Spreader Stoker)

Company Name: Crawfordsville Electric Light and Power

Address, City, IN, Zip: 700 Lafayette Road, Crawfordsville, Indiana 47993

Title V: T107-6495-00003

Reviewer: Laura M. Groom

Date: March 2001

Heat Input Capacity MMBtu/hr		Heat Content of Coal Btu/lb of Coal	Potential Throughput tons/year	Weight % Sulfur in Fuel		
192	#6	11,500	73,127	S =	1.7	%
				A=	7.82	%
				ESP Control Efficiency	98.2%	%

	Pollutant									
	PM	PM10	SO2	NOx	VOC	CO	Magnesium	Hf	As	HcL
Emission Factor in lb/ton	66.0	13.20	65.0 (38S)	11.0	0.07	5.00	0.01	0.15	0.00041	1.2
Potential Emission in tons/yr	**2413.2**	**482.6**	**2375.9**	**402.2**	**2.6**	**182.8**	**3.66E-01**	**5.48E+00**	**1.50E-02**	**4.39E+01**

Emission Factors are from AP 42 (Update 9/98), Tables 1.1 -4, 1.1-3 and 1.1-18 (SCC 1-01-002-04/24, 1-02-002-04/24, 1-03-002-09/24)

Potential Throughput (tons/year) = Heat Input Capacity (MMBtu/hr) x 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x 8,760 hrs/yr

Heat Content of the Coal is taken from the application

Additional emission factors for commercial/institutional and electric generation boilers are available in AP-42, Chapter 1.1.

Several HAPs emission factors are also available in AP-42, Chapter 1.1, depending on the type of boiler.

Emission (tons/yr) = Throughput tons per year x Emission Factor (lb/ton) / 2,000 lb/ton

Emissions (lbs/MMBtu) = 10^6 Btu/MMBtu / Heat Content of Coal (Btu/lb) / 2000 lb/ton x Emission Factor (lb/ton)

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations
Internal Combustion Engines - Distillate Oil
Generator (>600 HP)

Company Name:	Crawfordsville Electric Light and Power
City, Indiana:	Crawfordsville, Indiana
County:	Montgomery
Title V:	T107-6495-00003
Reviewer:	Laura M. Groom
Date:	December 1998

Heat Input Capacity
MM Btu/hr

10.0

S= 0.25 = WEIGHT % SULFUR

	Pollutant					
	PM	PM10	SO2	NOx	VOC	CO
Emission Factor in lb/MMBtu	0.1	0.1	1.01S	3.20	0.09	0.85
Potential Emission in tons/yr	4.4	4.4	11.1	140.2	3.9	37.2

Methodology

MMBtu = 1,000,000 Btu
Emission Factors are from AP 42 Table 3.4 and Table 3.4-1
Emission (tons/yr) = [Heat Input (MMBtu/hr) x Emission Factor (lb/MMBtu)] * (8760 hr/yr) / (2,000 lb/ton)